<u>Tab 34</u>

FIRST JUDICIAL DISTRICT OF PENNSYLYANIA and Attested by the COURT OF COMMON PLEAS OF PHILAD PRIPAR OF Judicial Records 13 DEC 2023 01:13 pm C. PERRY

Case ID No. 230400452

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint of for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association Lawyer Referral and Information Service One Reading Center Philadelphia, Pennsylvania 19107 (215) 238-6333 TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decider a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado immediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados De Filadelfia Servicio De Referencia E Informacion Legal One Reading Center Filadelfia, Pennsylvania 19107 (215) 238-6333 TTY (215) 451-6197

10-284 Case ID: 230400452

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EDWIN LEÓN 622 Fulton St.

Conshohocken, PA 19428

Plaintiff,

v. NEHAMA HANOCH

101 W. 10th St. Wilmington, DE 19801

and

CHEYENNE GOODMAN 101 W. 10th St.

Wilmington, DE 19801

Defendants :

COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PA

CIVIL ACTION

CASE ID NO. 230400452

COMPLAINT

Plaintiff, Edwin León, ("Plaintiff"), hereby files this Complaint against the Defendants, Nehama Hanoch, (the "Hanoch Defendant") Cheyenne Goodman, (the "Goodman Defendant") and Roxanne Eastes (the "Eastes Defendant" and collectively the "Defendants"), and in support thereof, avers as follows:

I. THE PARTIES

1. Plaintiff, Edwin León ("Plaintiff") is an adult individual with a residence at 622 Fulton Street, Conshohocken, Pennsylvania 19428.

- 2. Defendant, Nehama Hanoch, ("Hanoch Defendant") is an adult individual with a residence at 101 W. 10th Street, Wilmington, Delaware 19801.
- 3. Defendant, Cheyenne Goodman, ("Goodman Defendant") is an adult individual with a residence at 101 W. 10th Street, Wilmington, Delaware 19801.

II. JURISDICTION AND VENUE

- 4. The actions, inactions, errors, and omissions of the Defendants were performed in Philadelphia County, Pennsylvania.
 - 5. The amount in controversy is greater than \$50,000.00.
- 6. Pursuant to Pa. R. Civ. P. Nos. 1006(a), 2130(a) and 2179(a), venue is proper in this Court.

III. OPERATIVE FACTS

- 7. The Plaintiff was employed by the law firm of Young, Conaway, Stargatt and Taylor, LLP ("YCST") as a law clerk in August of 2021.
- 8. Plaintiff believes and avers that the Hanoch Defendant was an employee of YCST in August of 2021 and promoted to an associate with the firm in October 2021 when she passed the Delaware bar examination.
- 9. Plaintiff believes and avers the Goodman Defendant was employed by YCST as a legal intern in the winter of 2022 while she was completing law school.
- 10. Subsequent to completing the Delaware Bar Examination in July 2022, the Goodman Defendant began work as a law clerk at the YCST firm.
- 11. During this time, the Plaintiff and Ms. Hanoch were part of a group of friends who frequently socialized together.

- 12. The Plaintiff and the Hanoch Defendant would spend time together as friends. Ms. Hanoch even referred to the Plaintiff as being like a brother to her.
- 13. During the summer of 2022, the Plaintiff and Ms. Goodman had the opportunity to take time from their employment and workloads to study for the Delaware bar examination where they spent many hours together.
- 14. During this time, the Plaintiff and Ms. Goodman entered into a casual dating relationship.
- 15. As time passed the relationship became romantic, intimate and included sexual relations. The sexual relationship frequently included sexual intercourse, role playing and acts of BDSM
- 16. Ms. Goodman, who was an avid reader, even shared with the Plaintiff several of her books which detailed fantasy sexual acts in which she wished the Plaintiff would participate.
- 17. Despite their relationship and sexual intimacy Goodman kept the relationship a secret from Ms. Hanoch and their other colleagues at YCST.
- 18. After completing the 2022 Delaware bar exam, the Plaintiff returned to YCST as a law clerk while he awaited the bar examination results.
- 19. At this point the Plaintiff was working full time at YCST and had less time to spend with Ms. Goodman.
 - 20. In August 2022, Goodman started to work at YCST as a legal intern.
- 21. During this time, Goodman was introduced by the Plaintiff to a group of friends at YCST who regularly socialized together.
 - 22. During the fall of 2022, the Plaintiff and Ms. Hanoch ended their friendship.

- 23. At this point Ms. Goodman began to fabricate and share with others a story that she was being stalked and harassed by the Plaintiff. See attached **Exhibit "A"** which includes copies of select text messages exchanged between Goodman and Hanoch. Note that the redactions are the Defendants and to date, unredacted copies have not been provided.
- 24. Ms. Goodman fabricated and told stories of the Plaintiff being a sexual deviant. *See*, Exhibit A.
- 25. Plaintiff understands and avers that statements made by Goodman to Hanoch are inconsistent with phone, text and Snapchat records between Plaintiff and Goodman. See attached **Exhibit "B"** for select text messages and Snapchat message exchanges between Plaintiff and Goodman.
- 26. Plaintiff believes and avers that Ms. Goodman on numerous occasions told Ms. Hanoch that the Plaintiff was stalking her and/or hazing her at work. *See*, generally, Exhibit A.
- As a result, Ms. Hanoch broadcast her feelings that she did not want to be friends with someone like the Plaintiff who treated her friend Ms. Goodman poorly. *See,* generally, Exhibit A.
- 28. It was unknown to Ms. Hanoch at this time that the Plaintiff and Ms. Goodman were engaged in an ongoing intimate relationship, which Goodman apparently wanted to keep secret from her friend Ms. Hanoch. *See*, generally, Exhibit B.
- 29. Also at this time Hanoch and Goodman became close friends while working tat YCST.
- 30. As a result of the Goodman and Hanoch friendship, and their individual relationship with Plaintiff, it became increasingly important to Goodman that she needed to keep her relationship with Plaintiff a secret from Hanoch.

- 31. Plaintiff understands and avers that prior to the events of December 16 and 17, 2022, Goodman never told Hanoch she had been in an intimate relationship for months with Plaintiff which included regular visits to his home in PA.
- 32. Goodman, also until after December 17, 2023, never told Hanoch that she had daily contact with the Plaintiff through various media, including text messages, FaceTime calls, Snapchat messages and audio phone calls, which were regularly initiated by each of the parties. *See*, generally, Exhibit B.
 - 33. Instead, Goodman repeatedly told Hanoch that the Plaintiff was stalking her.
- 34. During this time, Goodman shared with Hanoch false information about the Plaintiff in an effort to keep Hanoch from renewing her friendship with Plaintiff while simultaneously telling the Plaintiff to keep his distance from Hanoch.
- 35. Goodman made these statements to create a narrative that Plaintiff was the type of person from which Goodman needed protection.
- 36. In August 2022, Goodman pressured Plaintiff to commit to a deeper and longer term relationship.
- 37. Plaintiff further believes and avers that Goodman actively concealed from Hanoch that in November 2022, she regularly spent time at Plaintiff's home and even suggested she work from his house.
- 38. In December 2022 Goodman continued to flirt with Plaintiff while not sharing her relationship with anyone including Hanoch.
- 39. Plaintiff believes and avers that eventually, Hanoch began to believe that Goodman required protection from Plaintiff based on fabrications made by Goodman to Hanoch.

- 40. Despite the continued disparaging accusations about Plaintiff made by Goodman, Hanoch, the Plaintiff and Goodman continued to socialize in public together and planned to be together the evening of December 16, 2022, with a group of other friends and colleagues from YCST.
- 41. Goodman and Hanoch drove to Philadelphia together as passengers in a car driven by a YCST colleague, Carol Cox.
- 42. The Plaintiff arrived in Philadelphia separately and did not attempt to drive or otherwise arrange for transportation for the Goodman Defendant to Philadelphia.
- 43. Throughout the course of the evening, and unbeknownst to Hanoch, Goodman and the Plaintiff repeatedly sent each other racy texts and Snapchat messages which outlined the ways in which the Goodman and Plaintiff would engage in intercourse and bondage after the night out. The Goodman Defendant even stated, "I want to have sex with you." *See*, Exhibit B.
- 44. The entire group left together and made their way to the Ranstead Room in Philadelphia. They were unable to accommodate the group, so the group stopped in a local bar.
- 45. The entire group then went to Woody's Bar located at 202 S. 13th Street, Philadelphia.
- 46. At Woody's, the group danced and drank for approximately two (2) hours. During this time, Goodman and the Plaintiff left to spend time together and avoid being seen kissing and caressing each other.
- 47. On two separate occasions alcohol was spilled on Plaintiff by others in the group and Plaintiff and Goodman used this as an excuse to leave the larger group and be alone.
- 48. Despite the fact that the Goodman Defendant and the Plaintiff were flirting with each other all evening, Goodman told Hanoch that she did not like the Plaintiff.

- 49. Goodman continued to fabricate a story about Plaintiff asking her whether she was wearing underwear, which she used to explain to Hanoch that the Plaintiff made her uncomfortable.
- 50. When the evening was ending in the early morning hours of December 17, 2022, Goodman was intoxicated, and unable to continue the charade about her relationship with the Plaintiff.
- 51. Toward the end of the evening, Goodman abruptly left Woody's alone and without notice to anyone else in the group.
- 52. Once outside of Woody's, Goodman called Plaintiff and told him she was outside of Woody's and was unable to re-enter.
- 53. Goodman told the Plaintiff that she had too many drinks, was not feeling well, and that she wanted to leave.
- 54. The Plaintiff exited the bar and met Goodman on the sidewalk, bringing her coat at her request. Outside of Woody's the Plaintiff encountered a bouncer who told the Plaintiff that Goodman was prohibited from re-entering Woody's because she was too intoxicated.
- 55. Goodman asked Plaintiff to take her to get food. Plaintiff and Goodman walked approximately two blocks when the Goodman Defendant and the Plaintiff received a group text asking them to meet their friends near Woody's.
- 56. Goodman and the Plaintiff decided to walk back to Woody's. Goodman and Plaintiff spoke, laughed, and spent time together with friends Emily Jones ("Jones") and her fiancée, Mr. Schugg ("Schugg").
 - 57. Schugg offered Goodman a ride home, but Goodman declined.

- 58. Instead, Goodman stated that she wanted to take an Uber alone from City Hall, which was approximately ten minutes away by foot.
- 59. Then, Goodman turned away from Jones and Schugg, waived at the Plaintiff to follow her, and started walking away.
- 60. As Goodman began to walk away from the group, Plaintiff and Schugg followed Goodman.
- 61. Jones asked Plaintiff to send her a text message when Plaintiff knew Goodman was home.
- 62. At some point, Schugg returned to his fiancée and Plaintiff told Jones that he would make sure Goodman returned home safely.
- 63. As Goodman and Plaintiff walked toward City Hall, Hanoch texted Goodman and asked Goodman where she was located.
- 64. Goodman responded with a text message text that she was "Good" and that she was taking an Uber home.
- 65. Hanoch then asked Goodman with whom she was taking the Uber. Goodman sent a text to Hanoch explaining that she was trying to "get away" from the Plaintiff.
 - 66. Hanoch then told the Goodman to stay where she was and wait for her.
 - 67. At this point Goodman appeared to become even more anxious and distraught.
- 68. Goodman then began to shout at Plaintiff. After several minutes, Plaintiff decided to walk to his vehicle and away from Goodman.
- 69. When the Plaintiff was approximately fifty (50) yards away, Goodman yelled his name, and Plaintiff turned around toward the location.
 - 70. It appeared to Plaintiff that Goodman was being approached by an unknown male.

- 71. The Plaintiff began to jog towards Goodman and the male, and Goodman began walking away from the male.
- 72. When Plaintiff caught up to Goodman, Goodman began to run in the opposite direction and the Plaintiff followed.
 - 73. Eventually Plaintiff caught up to Goodman where she was sitting on the curb.
- 74. At this time Hanoch began to approach the City Hall area where Plaintiff and Goodman were located.
- 75. As Hanoch approached City Hall, Hanoch approached police officers who were in a car adjacent to City Hall and told them that a sexual assault was occurring and that she needed their assistance.
- 76. As Hanoch passed the police officers, she saw Plaintiff, approached Plaintiff and began to physically attack the Plaintiff with slaps and punches to his upper body and face area.
- 77. Hanoch repeatedly struck the Plaintiff, without warning, with her fists, multiple times. Hanoch blows to Plaintiff caused bruising and a visible, bleeding cut to Plaintiff's face.
 - 78. Hanoch shouted at Plaintiff stating that she would "fucking kill" the Plaintiff.
- 79. Hanoch continued to hit and slap Plaintiff even when he attempted to explain that he was attempting to assist Goodman.
- 80. At this time, Plaintiff became lightheaded and told Hanoch while she was still punching and slapping him that he would have to speak to the nearby police officers if she did not stop her slapping and punching him.
- 81. Despite this warning, Hanoch Defendant continued to physically attack the Plaintiff while simultaneously making verbal threats to the Plaintiff, including threatening to go to the police in retaliation in order to get the Plaintiff into "trouble."

- 82. Hanoch's behavior was a physical assault on Plaintiff.
- 83. Plaintiff immediately went and spoke to police officers. Plaintiff provided all relevant information to the police, asked the police to contact medical professionals, and waited for the police to generate a police incident number for assault, harassment, and terroristic threats.
- 84. Goodman continued to make false statements that she and Plaintiff were not in a consensual intimate relationship and told Hanoch the same. Hanoch then continued to make the same false statements to friends and colleagues at the YCST community including that the Plaintiff was a deviant, aggressive, sexual stalker.
- 85. Eventually, Plaintiff was examined in an ambulance and after a period of time, the Plaintiff was cleared and released from the scene.
- 86. At approximately 3:00 a.m. on December 17, 2022, Goodman called Plaintiff at his home and apologized, stating that she was drunk and had an unexpected panic attack.
- 87. The Plaintiff inquired as to why the Goodman Defendant was saying he was chasing her, and the Goodman Defendant responded "Because you were chasing me I didn't say you were doing anything wrong, I just said it made me panic."
- 88. Goodman told the Plaintiff "I'm just processing how I feel. I don't think that anything that you did was wrong, it was just the act that made me panic."
- 89. The Goodman Defendant also stated, "They don't think you attacked me and if they do I will be very clear that you didn't okay?"
- 90. At no time did Goodman disclose to the Plaintiff that she had, for months, been defaming the Plaintiff to Hanoch with false stories about sexual stalking and hazing.
- 91. Instead, Goodman attempted to assure Plaintiff that she would call their coworkers and let them know that Plaintiff was actually trying to help her, and the incident was a

misunderstanding. Goodman told Plaintiff, "I'm sorry, I'll talk to her [Hanoch] in the morning, I promise, and I'll talk to everyone else and make sure that they know;" and "It's just a misunderstanding, I told you I'll fix it in the morning I promise," and "I get that you were trying to protect me," "you could have let me have space and just let me be in your eyesight."

- 92. Goodman told the Plaintiff not to contact their co-workers and the other Defendant until she had the opportunity to tell the co-workers and other Defendant about the misunderstanding.
- 93. Plaintiff was still concerned but Goodman repeatedly assured him by explaining that "I promise you I'll fix it in the morning." "I think they just saw me having a panic attack and assumed the worst." "I promise you I'll fix it and they'll all know it was my fault not yours. I promise."
- 94. The next day, Goodman began once again to contact Plaintiff, ultimately resulting in Goodman visiting the Plaintiff at his home, entering the home using her own access code.
- 95. Additionally, and unbeknownst to Goodman, Hanoch is believed to have already contacted YCST and reported her version of the prior evening's events and demanded that the Plaintiff be immediately barred from any access to YCST. See attached as **Exhibit "C"** for a true and correct copy of the texts between Hanoch and her friends/colleagues.
- 96. Unaware of the actions of Hanoch in contacting YCST, Goodman entered the Plaintiff's home at approximately 1:00 p.m. on December 17, 2022 and the Plaintiff and Goodman spent hours together, laying in each other's arms and spending romantic time together.
- 97. Goodman also explained to the Plaintiff that she would contact a more senior attorney at YCST and tell her about the purported traumatic event so that other co-workers would understand the event the prior evening and not think poorly of the Plaintiff.

- 98. After spending an afternoon together, Goodman told the Plaintiff that she would contact all co-workers and "make this right," by telling them that she was drunk but not in any danger during the previous night.
 - 99. Prior to leaving the Plaintiff's house, the Plaintiff and Goodman were intimate.
- 100. After many hours of intimate time together, Goodman told Plaintiff their relationship was her priority, and that she would choose to make the situation right even at the cost of her friendship with Hanoch.
- 101. Unbeknownst to the Plaintiff at the time, Hanoch contacted multiple parties in the group that was in attendance during the evening of December 16 17, 2022, in order to get their stories straight prior to reporting the events of the previous evening to YCST.
- 102. Goodman and Hanoch also, along with several of the YCST colleagues who were present the night of December 16, 2022, (and into the early morning hours of December 17, 2022) were planning to meet with senior members of YCST to request that the Plaintiff be blocked from accessing YCST and to further the narrative that the Plaintiff was a dangerous criminal.
- 103. On Sunday, December 18, 2022, at approximately 11:00 p.m., the Plaintiff attempted to login to his work email and plan for his week.
- 104. The Plaintiff was surprised when, without notice, the Plaintiff was suddenly locked out of the YCST system.
- 105. The Plaintiff next contacted IT and after an hour of attempts, the YCST IT department said they could not help until the following day.
- 106. As a result, the Plaintiff then checked his personal email and became instantly ill, both visibly and physically. In his personal email he read an email sent to him by YCST indicating that he had been accused of something serious, and as a result he would be suspended

from YCST with pay. See attached as **Exhibit "D"** for a true and correct copy of the email sent by YCST to the Plaintiff.

- 107. The Plaintiff immediately contacted the YCST representative who indicated that at least one employee had accused him of either sexual or physical assault.
- 108. Plaintiff also attempted to view Goodman's social media profile and found that he was prohibited from viewing her profile, and prohibited from viewing the profiles of most of the other YCTS colleagues who were present during the night out in Philadelphia, as well as additional individuals who were not present that evening.
- 109. Plaintiff believes and avers that the Defendants and their YCST colleagues with whom they were socializing that December evening decided to collectively paint the Plaintiff as a deviant, aggressive, sexual stalker in order to justify the assault by Hanoch on the Plaintiff.
- 110. Plaintiff subsequently learned that the Defendants collectively contacted individuals that collaborated with the Plaintiff, friends they shared with the Plaintiff and coworkers of the Plaintiff for the purpose of destroying his reputation and protecting Hanoch.
- 111. Throughout this time, more co-workers unfollowed or deleted the Plaintiff from social media and professional platforms such as LinkedIn, Instagram, and Facebook.
- 112. A few days after the Plaintiff was able to discuss the incident with YCST, the Plaintiff learned that another alleged friend of Plaintiff was talking about Plaintiff in Washington, D.C. explaining that the Plaintiff not only assaulted Goodman, but that he had in fact raped Goodman.
- 113. Further, the Plaintiff learned that Hanoch had contacted individuals as well as other female attorneys and told them that the Plaintiff was a dangerous predator, and that should

anyone contact them about Plaintiff, to explain that they fear the Plaintiff as being a dangerous person.

- 114. It is clear that Goodman had no reasonable belief that Plaintiff controlled her and could force her into a relationship with the Plaintiff.
- 115. It is also clear that at all times, the Plaintiff and Goodman were engaged in a consensual sexual relationship.
- 116. Plaintiff learned that on or about December 22, 2022, a senior attorney at YCST took Goodman to the Plymouth Township Police Department to report the Plaintiff for an alleged sexual assault against her.
- 117. As a result, Plaintiff had to retain legal counsel to represent him on the potential criminal charges, separate and apart from the civil litigation.
- 118. Further, the Plaintiff had to submit himself to police interviews and a polygraph examination, which, three (3) months after the report by Goodman, resulted in the Plymouth Township Police Department representing to Plaintiff's criminal defense counsel that Plaintiff was no longer the subject of any criminal investigation for the alleged sexual assault. See attached as **Exhibit "E"** for a true and correct copy of the letter sent by Plaintiff's counsel detailing these representations by the Plymouth Township Police Department.
- 119. However, Goodman still maintained that the investigation was ongoing despite having this knowledge in late February and early March.
- 120. Each of the Defendants actively participated in one or all of the collective activities described above in order to accomplish their goal of destroying the Plaintiff's reputation and dissuading him from pursuing any charges against Hanoch.

- 121. It is clear the Defendants all agreed to falsely claim that the Plaintiff was a dishonest and dangerous individual.
- 122. The Defendants repeatedly published these false rumors to Plaintiff's employer, co-workers, and friends.
- 123. As a result of these false statements, on or about December 27, 2022, the Plaintiff attempted to hire an attorney to represent him in the instant matter.
- 124. The Plaintiff was fearful that the Defendants would take additional actions in an attempt to further malign the Plaintiff.
 - 125. This counsel in fact attempted to contact Goodman on December 29, 2022.
- 126. Upon information and belief, it was this call which prompted the Goodman

 Defendant to move forward with filing the Protection From Abuse Order in the State of Delaware

 Family Court.
- 127. Defendants' actions have permanently damaged Plaintiff's reputation and his ability to succeed in his chosen profession.
- 128. Since the incident on December 17, 2023, and as a direct result of the statements made by the Defendants, the Plaintiff has lost contacts in his professional network, has been suspended from work, and has been repeatedly referred to as a criminal among friends and coworkers.
- 129. In a further act of harassment and defamation, on or about January 3, 2023, Goodman, in concert with Hanoch, filed a Protection from Abuse ("PFA") petition in the State of Delaware, along with multiple pleadings drafted by Goodman with the assistance of Hanoch.
- 130. During the PFA litigation, Goodman continued to deny she and the Plaintiff were in an intimate relationship.

- 131. In an effort to protect his reputation and personal interests, Plaintiff needed to engage the services of a family law attorney and defend himself against the false allegations asserted by the Goodman Defendant.
- 132. The PFA proceedings spanned six (6) months and cost the Plaintiff thousands of dollars.
- 133. Plaintiff believes and avers that eventually, Hanoch learned of Goodman's false allegations during the PFA trial yet continued to maintain their numerous false statements about Plaintiff despite their duty of candor, honesty and integrity as licensed attorneys.

IV. <u>CAUSES OF ACTION</u>

COUNT I - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

- 134. Plaintiff hereby incorporates paragraphs 1 through 133 above by reference as though same were fully set forth at length.
 - 135. Defendants have engaged in defamatory conduct directed toward Plaintiff.
 - 136. Defendants have engaged in assault and battery directed to the Plaintiff.
 - 137. Defendants' conduct was outrageous.
- 138. Defendants' conduct was taken in response to the Plaintiff filing a police report against Hanoch in an effort to cover-up the repeated and numerous false statements of Goodman and Hanoch and the assault and battery by Hanoch on the Plaintiff.
- 139. The Defendants' conduct has continued for more than nine (9) months and has increased in frequency and severity as the months have passed.
- 140. The Defendants are aware or should be aware that Plaintiff suffers from a serious anxiety disorder as a result of his military and police service.

- 141. The Defendants' conduct has caused the Plaintiff to fear arrest and retribution from the Defendants and his former YCST colleagues.
- 142. The Defendants' conduct has caused additional anxiety and severe emotional distress on Plaintiff causing him to seek mental health care.
- 143. The Defendants' conduct has caused the Plaintiff to fear losing his current employment, and further fear that he may become unable to seek or maintain bar membership and other meaningful employment in the practice of law.

WHEREFORE, Plaintiff, Edwin León, respectfully requests that this Honorable Court and the trier of fact find in his favor and against the Defendants.

<u>COUNT II – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS</u>

- 144. Plaintiff hereby incorporates paragraphs 1 through 143, above, by reference as though same were fully set forth at length.
 - 145. Defendants have engaged in defamatory conduct directed toward Plaintiff.
 - 146. Defendants have engaged in assault and battery directed to the Plaintiff.
 - 147. Defendants' conduct was outrageous.
- 148. Defendants' conduct was taken in response to the Plaintiff filing a police report against Hanoch in an effort to cover-up the repeated and numerous false statements of Goodman and Hanoch and the assault and battery by Hanoch on the Plaintiff.
- 149. The Defendants' conduct has continued for more than nine (9) months and has increased in frequency and severity as the months have passed.
- 150. The Defendants' conduct has caused the Plaintiff to fear arrest and retribution from the Defendants and his former YCST colleagues.

- 151. The Defendants' conduct has caused additional anxiety and severe emotional distress on Plaintiff causing him to seek mental health care.
- 152. The Defendants have a duty to exercise reasonable care in their behavior toward other members of the legal community.
- 153. The Defendants' conduct has caused the Plaintiff to fear losing his current employment, and further fear that he may become unable to seek or maintain bar membership and other meaningful employment in the practice of law.

WHEREFORE, Plaintiff, Edwin León, respectfully requests that this Honorable Court and the trier of fact find in his favor and against the Defendants.

COUNT III - INVASION OF PRIVACY

- 154. Plaintiff hereby incorporates paragraphs 1 through 153, above, by reference as though same were fully set forth at length.
 - 155. Defendants have engaged in defamatory conduct directed toward Plaintiff.
 - 156. Defendants have engaged in assault and battery directed toward the Plaintiff.
 - 157. Defendants' conduct has been outrageous.
- 158. Defendants' conduct was taken in response to the Plaintiff filing a police report against Hanoch in an effort to cover-up the repeated and numerous false statements of Goodman and Hanoch and the assault and battery by Hanoch on the Plaintiff.
- 159. The Defendants' conduct has continued for more than nine (9) months and has increased in frequency and severity as the months have passed.
- 160. Goodman filed a PFA against the Plaintiff, on the basis of information that was false, which Goodman and eventually Hanoch knew was false with the intent to make this

information public through the PFA litigation intending to do harm to the Plaintiff's personal and business reputation.

- 161. Defendants have published information about the Plaintiff to the general public.
- 162. Defendants have repeatedly disclosed or published information about Plaintiff which is false and damaging to Plaintiffs reputation.
 - 163. A reasonable person would find the conduct of the Defendants to be objectionable.

WHEREFORE, Plaintiff, Edwin León, respectfully requests that this Honorable Court and the trier of fact find in his favor and against the Defendants.

COUNT IV - DEFAMATION

- 164. Plaintiff hereby incorporate paragraphs 1 through 163, above, by reference as though same were fully set forth at length.
- 165. On or about December 17, 2022, Hanoch filed a report or request with YCST in which she accused the Plaintiff of specific behavior and acts to harm Plaintiff's personal and business reputation knowing or having a reasonable belief they were false when made by Hanoch.
- 166. On or about December 18, 2022, Hanoch and Goodman published statements about the evening of December 16-17, 2022 to YCST and alleged that the Plaintiff engaged in inappropriate conduct toward. Goodman which they knew or should have known were false when made.
- 167. Sometime in late December, Goodman, with the assistance of colleagues at YCTS, published to Plymouth Township police, false statements accusing the Plaintiff of criminal acts.
- 168. Then, in early 2023, Goodman, with the support of Hanoch, filed a PFA against the Plaintiff in the State of Delaware.

- 169. The PFA evidence presented by the Defendants included public disclosures about Plaintiff's personal life and personal information defaming the Plaintiff's character that were false when made, further alleging the Plaintiff of being engaged in a coercive sexual relationship with Goodman.
- 170. The materially false PFA allegations resulted in severe damage to the Plaintiff's personal and professional reputation and ability to be personally and financially successful in his legal profession within the State of Delaware where he was employed.
 - 171. The PFA allegations resulted in severe damage to the character of the Plaintiff.
- 172. Additionally, the false public statements made by the Defendants concerning the events of December 16-17, 2022, accusing the Plaintiff of being a dangerous sexual predator, a rapist and a coercive sexual deviant, have irrevocably damaged the Plaintiff.
- 173. The repeated statements in furtherance of this untrue narrative as to Plaintiff at the hands of Defendants, have caused and will continue to cause harm to the Plaintiff's business and personal life.

WHEREFORE, Plaintiff, Edwin León, respectfully requests that this Honorable Court and the trier of fact find in his favor and against the Defendants.

COUNT V – ASSAULT V. HANOCH DEFENDANT

- 174. Plaintiff hereby incorporates paragraphs 1 through 173, above, by reference as though same were fully set forth at length herein.
- 175. 18 Pa. C.S. § 2701(a) defines "assault" as occurring when one "(1) attempts to cause or intentionally, knowingly or recklessly causes bodily injury to another; (2) negligently causes bodily injury to another with a deadly weapon; (3) attempts by physical menace to put another in fear of imminent serious bodily injury."

- 176. In the early morning hours of December 17, 2022, the Hanoch Defendant intentionally struck the Plaintiff multiple times.
- 177. In the early morning hours of December 17, 2022, the Hanoch Defendant repeatedly threatened to kill the Plaintiff multiple times, attempting by physical menace to place the Plaintiff in fear of imminent serious bodily injury.
- 178. Here, Hanoch has engaged in an assault which has caused the Plaintiff mental and physical harm.
- 179. As a result of the assault, the Plaintiff has suffered emotional, physical and financial harm.

WHEREFORE, Plaintiff, Edwin León, respectfully requests that this Honorable Court and the trier of fact find in his favor and against the Defendants..

COUNT VI – ASSAULT V. GOODMAN DEFENDANT

- 180. Plaintiff hereby incorporates paragraphs 1 through 179, above, by reference as though same were fully set forth at length herein.
- 181. 18 Pa. Code § 2701(a) defines "assault" as occurring when one "(1) attempts to cause or intentionally, knowingly or recklessly causes bodily injury to another; (2) negligently causes bodily injury to another with a deadly weapon; (3) attempts by physical menace to put another in fear of imminent serious bodily injury."
- 182. Starting in the fall of 2022, Goodman began publishing defamatory statements about the Plaintiff.
- 183. Goodman made these false statement to her colleagues at YCST, including but not limited to the Hanoch Defendant.

184. In the early morning hours of December 17, 2022, Goodman made statements to

Hanoch that resulted in Hanoch believing that Plaintiff was threatening Goodman.

185. As a result of Goodman's repeated lies to Hanoch about Plaintiff, specifically the

statements made to Hanoch by Goodman, during the evening of December 16, 2022 and into the

early morning hours of December 17, 2022, in the early morning hours of December 17, 2022, the

Hanoch intentionally struck the Plaintiff multiple times resulting in physical and emotional injury

to Plaintiff.

186. In the early morning hours of December 17, 2022, Hanoch repeatedly threatened to

kill the Plaintiff multiple times, attempting by physical menace to place the Plaintiff in fear of

imminent serious bodily injury.

187. Plaintiff avers that Hanoch took these actions as a direct result of the intentionally

false statements told by Goodman to Hanoch.

188. Here, Goodman has engaged in assault which has caused the Plaintiff physical,

emotional and financial harm, harm.

189. As a result of the assault, the Plaintiff has suffered emotional and reputational

damage.

WHEREFORE, Plaintiff, Edwin León, respectfully requests that this Honorable Court

and the trier of fact find in his favor and against the Defendants.

Respectfully submitted,

PAX LEGAL, LLC

Dated: December 13, 2023

By:

Lida L. Bonner, Esq.

Neil M. Hilkert, Esq.

Counsel for Plaintiff,

Edwin León







Thu, Sep 15, 12:48 PM

helloooo are you

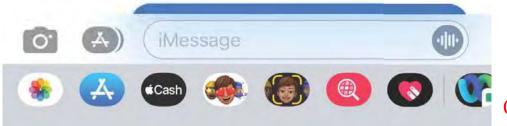
yes! I was 2 seconds away from coming to say hi before i remember i'm still masking for another day lol

> Jesse told me y'all had plans to watch a movie tonight, how are things going with that

tbh don't even come near the second floor everyyyyyone is coughing/ runny/gross

Ewwwww

I think better! I took ur advice and just addressed it directly and he was super nice and respectful about it (not that i didnt think he would be) and it hasn't seemed weird which is great cause i thought it would



Case ID: 230400450



Edwin did accuse me of hooking up with him AT the ren fair though that was fun. How have you been?? I feel like i haven't seen u in forever even though we are in the same place all day every day lol

What??? Lol accused you how

2 Replies

I'm okay!

wait you're sick??

also, i was fully coming to vent to u also about bosses being really annoying. What'd he do

> I felt sick after I got the new covid booster on Monday, nothing actually virus related

> > What's going on? Tell me first

What??? Lol accused you how

2 Replies

like, literally full on oh how was jesse?





iMessage





















What??? Lol accused you how

2 Replies

like, literally full on oh how was jesse?
And when i was like wtf did that
edwin smirk and walk away thing
good times can't wait for roxanne to
hear

oooooof not the booster. That knocked me out for days i can't believe u had to wirk

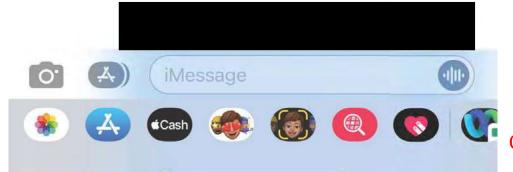
What??? Lol accused you how

2 Replies

That is so annoying jesus I'm sorry

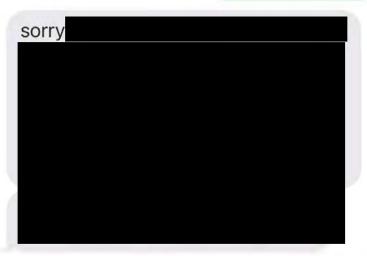
What's going on with the bosses though, who do you need to vent about

not an actual boss, just edwin full on hazing me not even bothering to hide it. But he's edwin he's not scary so i think u first lol



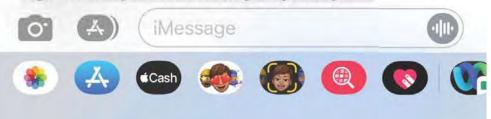
Case ID: 230400452





also, he's just being supper nitpicky about things like he called me the other day and i'd left work at 6 and he was like if i'm still here you should be too, and he's given me 2 all nighter assignments that were non-emergent things he just forgot to do and he snapped at me for not answering him at 10:30 the other night and said i was prioritizing going out (lol) over work and the project was

and he heeds someone to help with and today he snapped at me for not answering an email for 20 minutes and i was like you need boundaries and he just said okay i'll go fuck myself then. Its going really





snapped at me for not answering him at 10:30 the other night and said i was prioritizing going out (lol) over work and the project was

and he heeds someone to help with and today he snapped at me for not answering an email for 20 minutes and i was like you need boundaries and he just said okay i'll go fuck myself then. Its going really well lol

Okay whoa whoa whoa

First of all, he is a second year. We don't boss around first years like that, it's very inappropriate

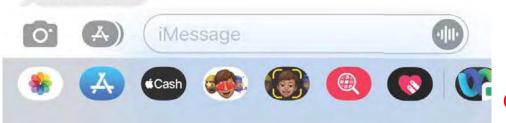
We're still junior associates and he shouldn't be delegating anything to you unless a partner told him to

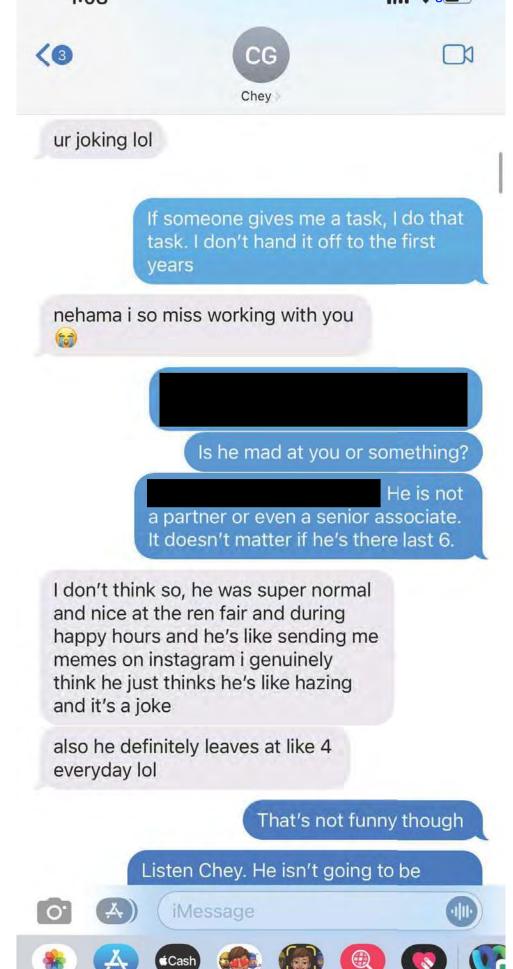
1 Reply

Next time he needs something can you tell him you don't have availability?

We're still junior associates and he shouldn't be delegating anything to you unless a partner told him to

ur joking lol









Come to the building happy hour at 5

ohhhh i keep forgetting we literally took the bar together

Also i would not repeat that (not that I think it needs to be said but just for comfort) i promise. I'm more mad because apparently he told jesse we're the best of friends and i'm like SURE then can you pls be nice to me

What the fuck

Ugh

Also i want to!! Brennan just texted lol. I think there might be a late meeting but if not i'll be there

Okay good

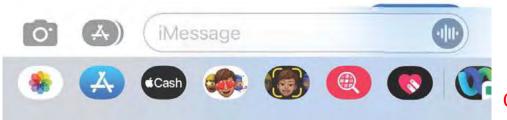
Lol Brennan

I made him text this cute guy in our building to come 😭

LMAO you did not

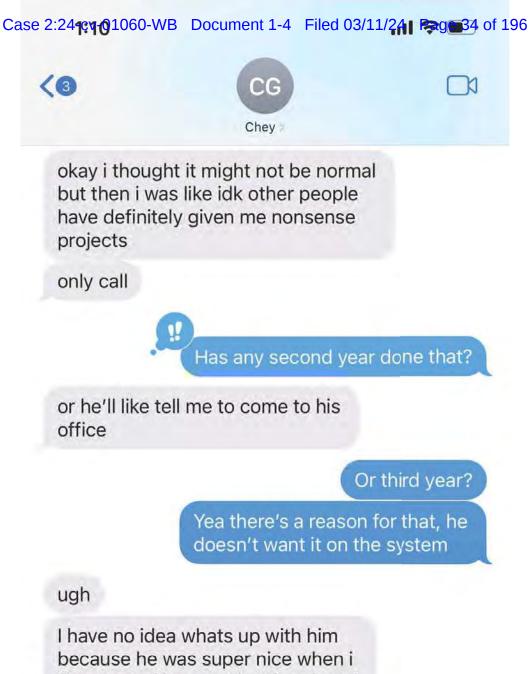
Tbh? Building manager goals

is the guy coming



Case ID: 230400452



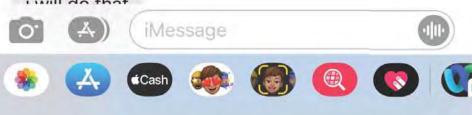


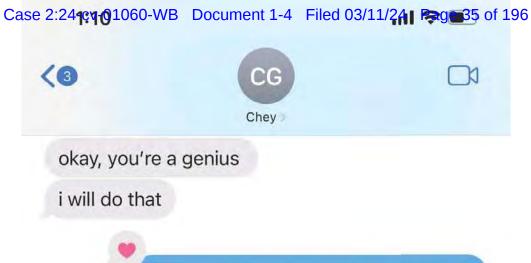
first started he must just be pissed about something

> Next time don't pick up the call if it's outside 830-630. Then email him and say I can't pick up the phone right now, how can I help you?

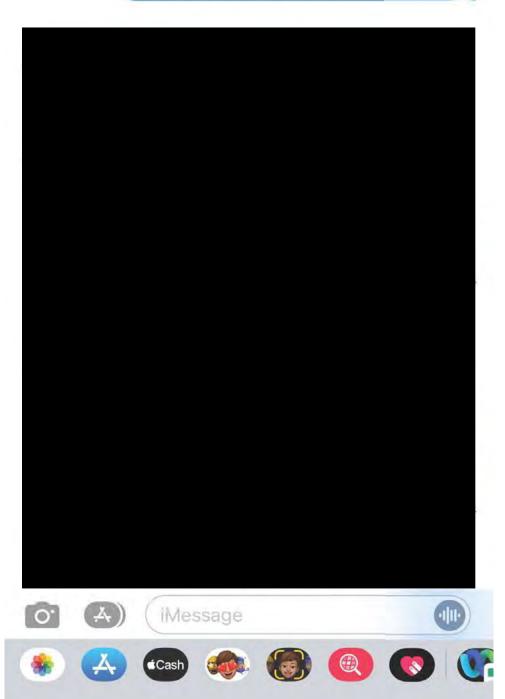
okay, you're a genius

i will do that





Then ask him what the billing number is and file it to the system





Promise me you'll tell me of Edwin keeps doing this to you

tbh thats such a move, i need to start doing that

i will, i appreciate u so much

And see if you can make yourself busy enough with other projects that you can tell him you're too busy.

And out of respect for you I'm not gonna pop off on Edwin for this but I so wish I could

that's a good idea, i definitely am i just personally feel weird saying no to work so it's also my fault lol. Also OOF yes please don't he's already probably mad i don't want to make it worse

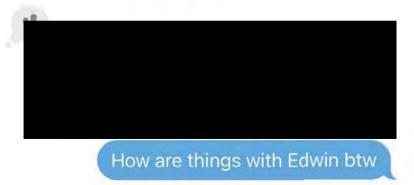
are you going to happy hour AT 5?







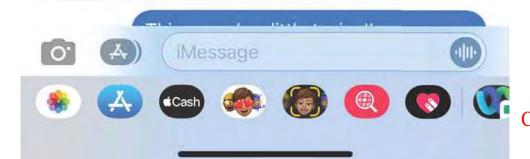
Wed, Sep 28, 1:18 PM

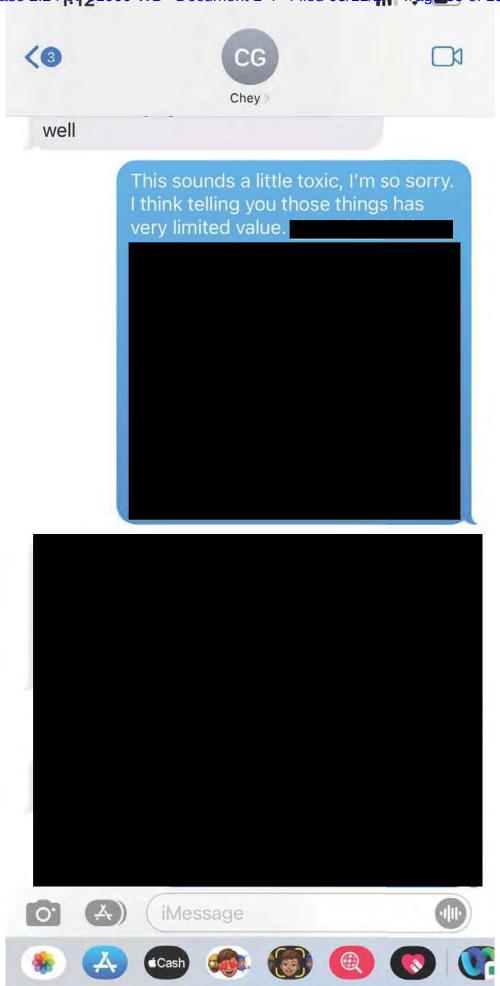


Thu, Sep 29, 6:52 AM



noooooot great tbh but he's definitely chilled out. He's taken it upon himself to share every bad thing katelin and all of the other new associates have said about me since starting which i could have done without but jury's out on if he means well







i appreciate you guys so much

You're still a lawyer too. And trust me no one is excited about this, even if Edwin told you otherwise

It happens all the time

i think katelin might be like 1% excited

but he might have Imao

Everyone else at the firm who i told has also been super nice

Well it looks like this was a rough year lol so that should be somewhat comforting

It is which makes me feel like terrible person lol

Not at all. It means the bar examiners were being especially vicious this year



love that for them

well does sabrina feel slightly better knowing how many people also didn't





Message









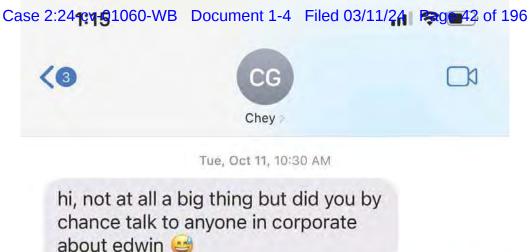












Only about my thing

Why?

chris just told me that joe mulvehil said something to him about keeping bankruptcy problems in bankruptcy re me and edwin but i have no idea?? He said it came from a partner

That's very strange

I know, my anxiety just skyrocketted about him hearing about it

From a partner that's so weird

Also Chris doesn't get to tell you who to tell your issues to

Does joe know everything?

I don't think he meant it that way i think it was just a heads up that joe mulvehil knows something but no i think he was just like i heard edwin is





Message





















I don't think he meant it that way i think it was just a heads up that joe mulvehil knows something but no i think he was just like i heard edwin is giving chey a rough time with work

which to be fair he stopped foing

it's super weird. I feel like maybe neiberg said something to someone the partners are all buddy buddy

Ugh this isn't fair to you

You're not a gossip piece. If they want to talk about it bc they're gonna DO something about it that's one thing

But this is your private life

Tue, Oct 11, 11:38 AM

Honestly i'm super sick of this whole section, if Katelin and Edwin don't leave soon I can't keep working with them this is unsustainable

also, should i tell the group about covid?? I feel bad going this weekend if everyone's going to be exposed

Do you know how long he has until he has to go?





iMessage





















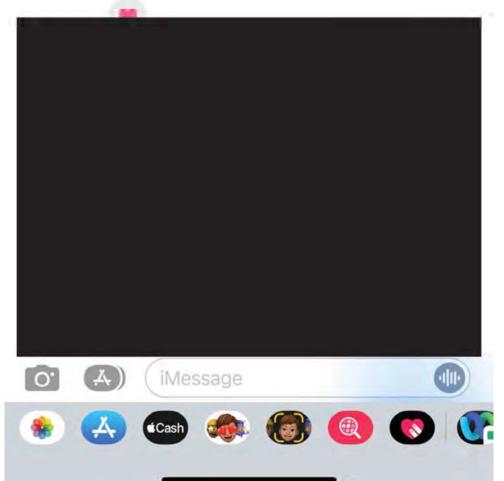
Tue, Oct 11, 11:38 AM

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also, should i tell the group about covid?? I feel bad going this weekend if everyone's going to be exposed

Do you know how long he has until he has to go?

No idea. He told me he talked to barry about it but i haven't followed up







I didn't want to ask last night in front of everyone but how was it yesterday with Edwin

it was definitely awkward, he offered to pick me up because he was driving josh too (to roxannes) but he was NOT

1 Reply



and he made a lot of little picky comments about jesse but i very much just ignored it, he's leaving in a month anyway



























Mon, Oct 24, 10:43 AM

Picky comments like suggesting that you and him are together ??

One month!! I thought he was already out

it was definitely awkward, he offered to pick me up because he was driving josh too (to roxannes) but he was NOT

Classic

no just like, talking about how jesse sent me the pictures from the ren fair but didn't send them to him and he wonders why and asking if i'm seeing him tonight (yesterday, bc i've def mentioned ur watch party's) and i was like Yes and also nehama and sabrina and gabby, it was just odd

but tbh i don't think roxanne even cares anymore she's suuuuper into her new guy

parties* oh my god. I'm blaming that





iMessage























I under you're stressed

Understand

Delivered

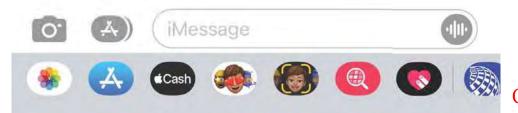
Yes it has been a while. I was trying to stop the bleeding but I understand.

Sun, Oct 9, 4:45 PM

I'm sorry for not telling you everything. I should have shared everything with you.

Today 2:29 PM

If I have a going away party; would you come?





were (it seems like ??) very good friends and if you did go it might be low pressure because other people would be there and then he'd be gone and it'd have ended on a positive note

> I honestly don't think I could put your stuff aside though

I have been, not putting it aside but definitely just not addressing it and being nice

he can deffffinitely tell though i'll be honest

How so?

but i don't want to be a reason you lose a friendship i so love and appreciate you for it but it's still you losing something i don't want it to be for me

3 Replies



I was a little short with him on saturday just because i honestly





iMessage





















so love and appreciate you for it but it's still you losing something i don't want it to be for me

3 Replies

You are not the reason chey, you're the target of his sexual harassment and misogyny. If he was doing this to anyone else then I would feel the same way about it. Even if I hated the girl

I am here, I think he knows better than to stop by in person





iMessage









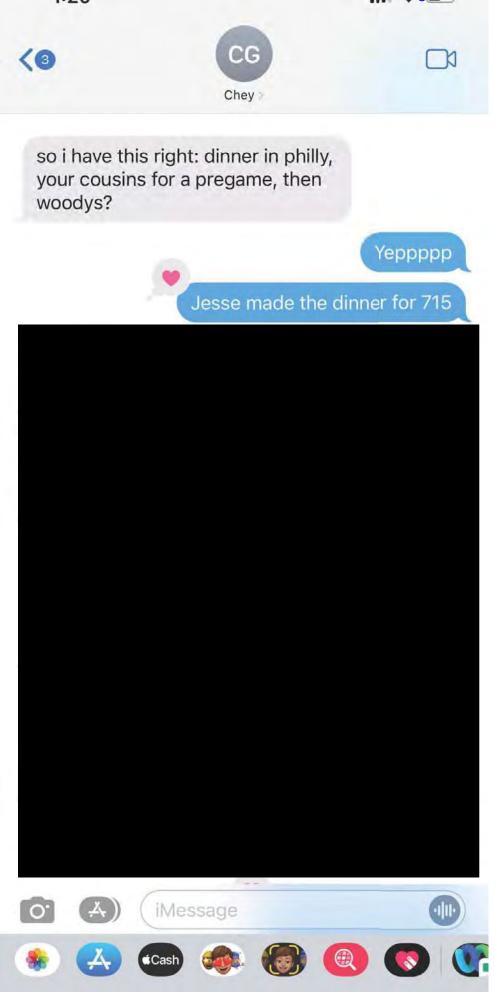


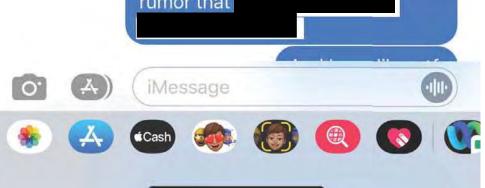






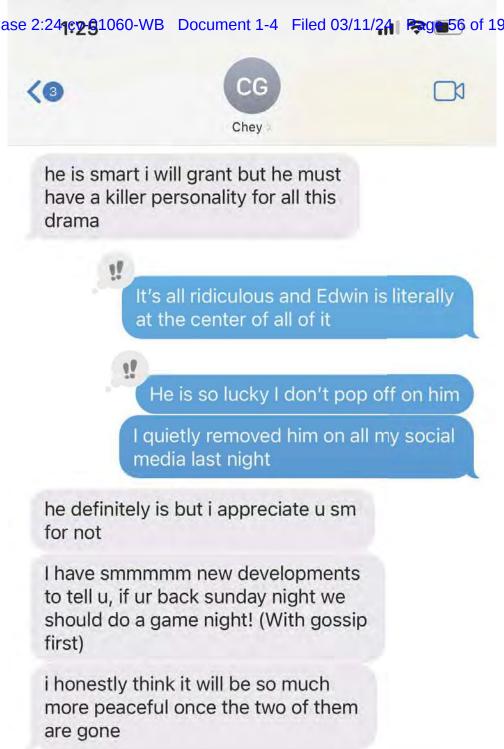


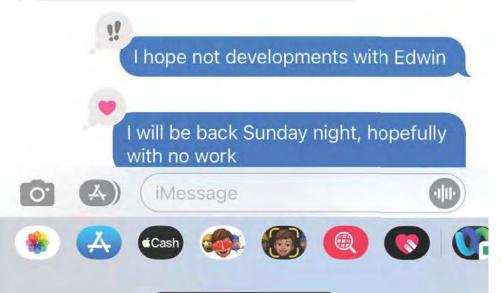




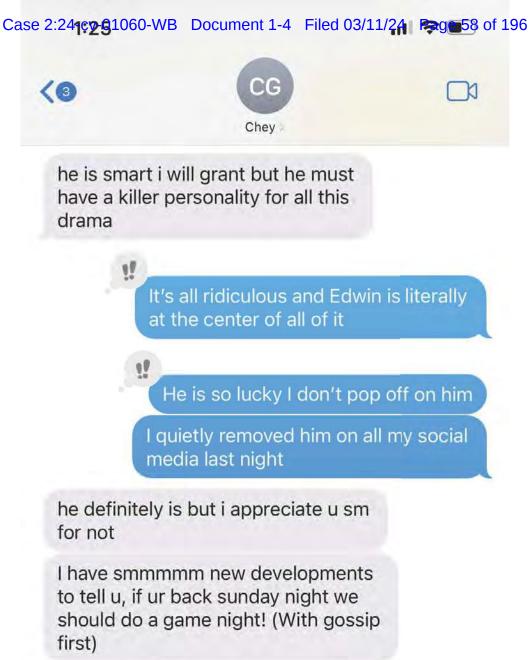






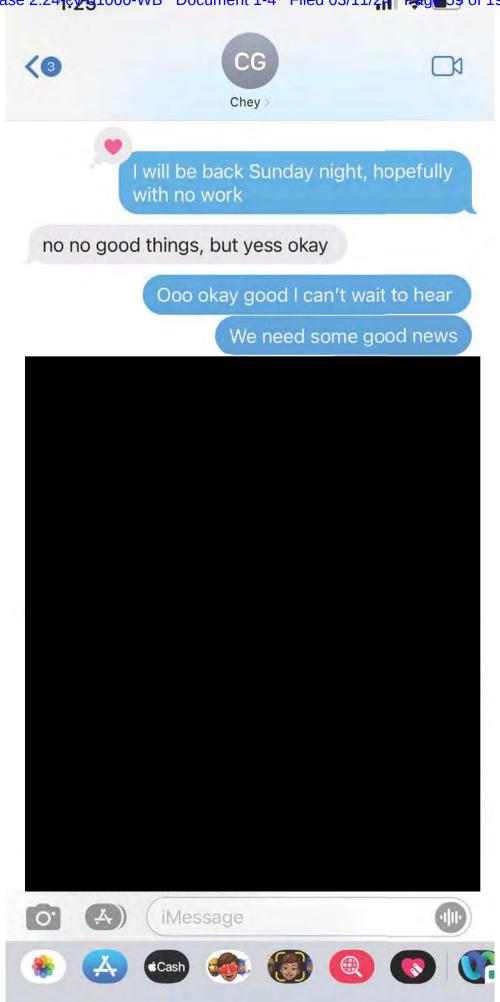


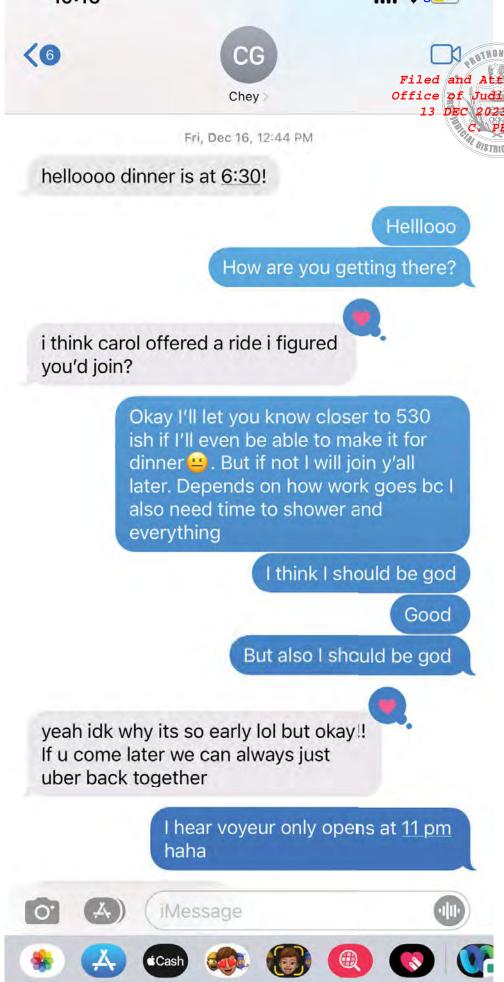




i honestly think it will be so much more peaceful once the two of them are gone

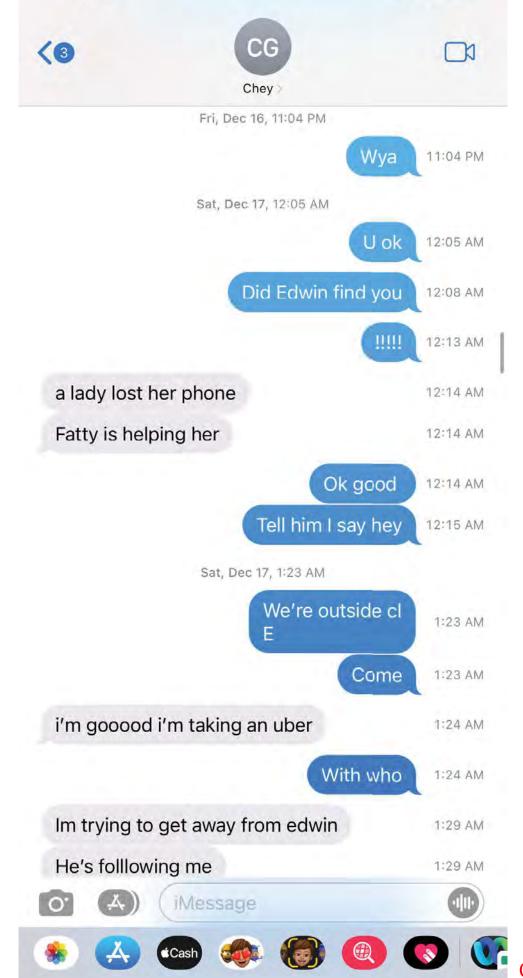






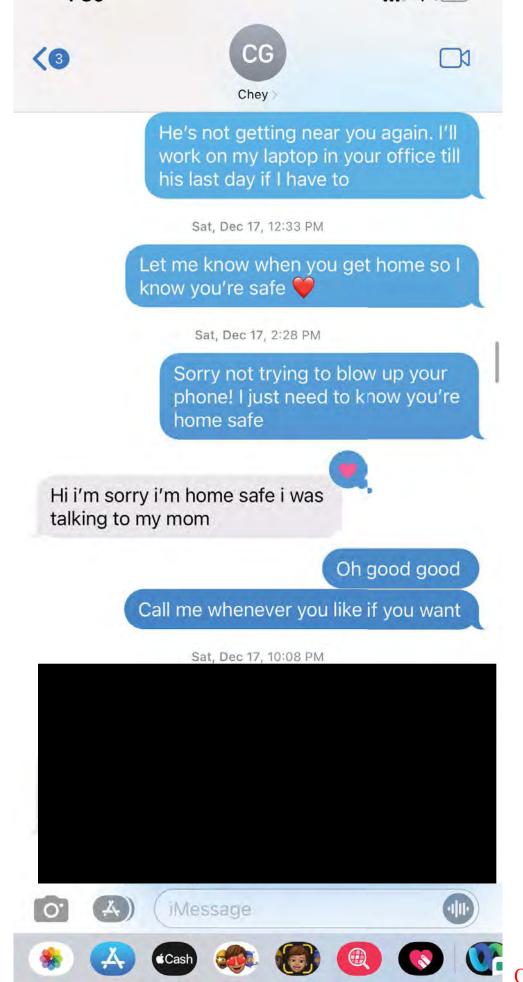














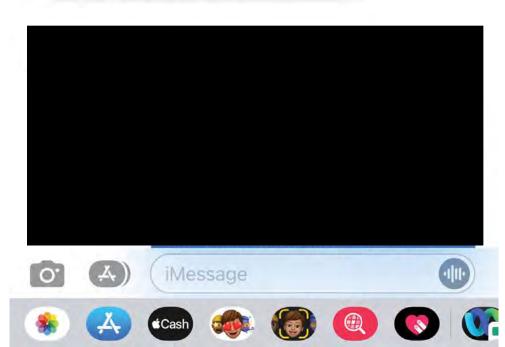
Sun, Dec 18, 10:57 AM

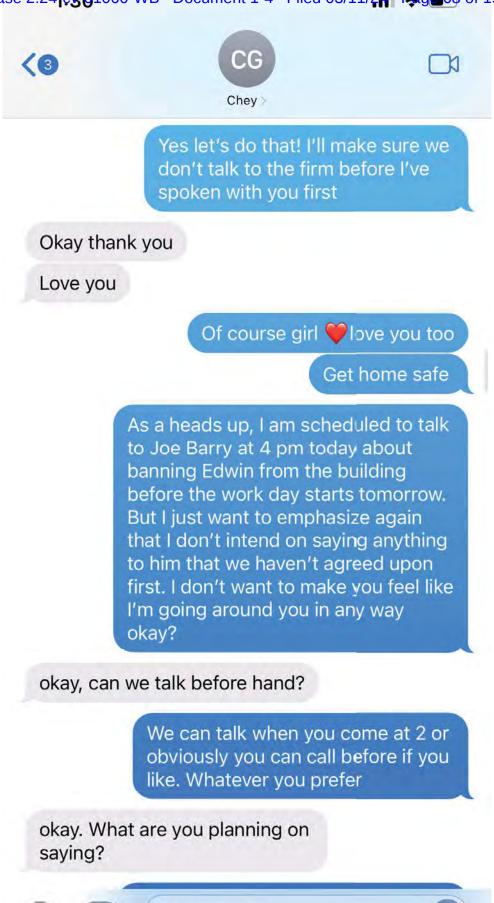
How's you sleep girl?

How did*

When you're up for it, wanna give me a call to talk a little bit? We would like to make sure Edwin can't get into the building starting tomorrow for all of our safety, especially yours and mine. But I don't want to say anything until I've spoken with you first.

yes, i'm going to be home around 2 and am gonna go chat with jesse. Can we talk after that?









okay. What are you planning on saying?

Well it depends a lot on what you're comfortable with. At a minimum I need to tell Joe that Edwin must not be allowed back in the building because he tried to harm/did harm someone on Friday night. | will tell him I stepped in at some point and made him leave, and that now Edwin is threatening to file a police report against me and is being extremely volatile. I'm going to tell him I don't feel safe having him come into the office. That's extremely barebones and it probably won't be enough for Joe to do anything. But if you are willing to let me tell joe you were that someone, that will probably be enough

okay, i really want to talk to chris about all of this

Have you had a chance to talk to him yet?

i'm nervous because i don't know if he was genuinely going to just take me home or not it was just a feeling and that can't be proved





Message





















i'm nervous because i don't know if he was genuinely going to just take me home or not it was just a feeling and that can't be proved

I think that Edwin is manipulating the situation. And when I confronted him he didn't say a thing about that

And he was doing shit to you all night

If he wanted you to get home safely, I find it strange he chose to drive you alone rather than find out whether I (someone who lives with you) plans to also go home

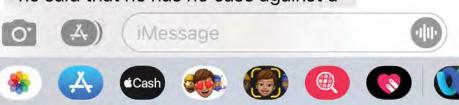
i agree with that

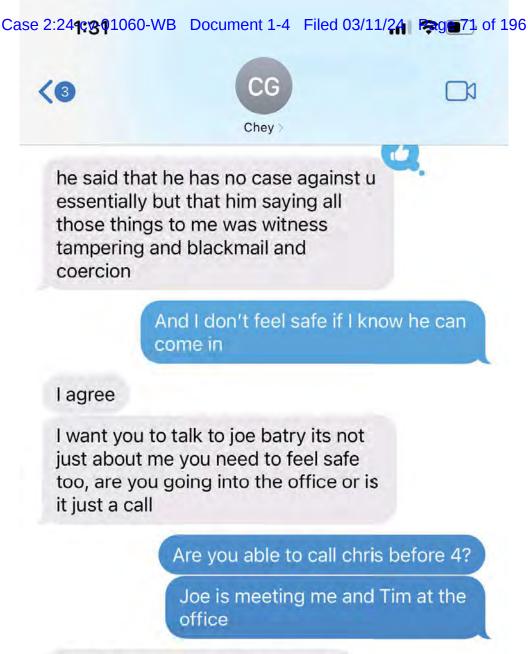
I did talk to chris yesterday but i was driving and he said he didnt want me getting super upset while driving and we can talk on monday but to call sooner if i want

But either way, we are at a breaking point with Edwin. He's had two days now to stew over what happened and what I did to him.



he said that he has no case against u





Okay, i'm going to leave to come home in 20

> Okay sounds good. I'll be around whenever you are back and ready

okay thank you

Is roxanne going to go









okay! One moment

Sun, Dec 18, 6:36 PM



























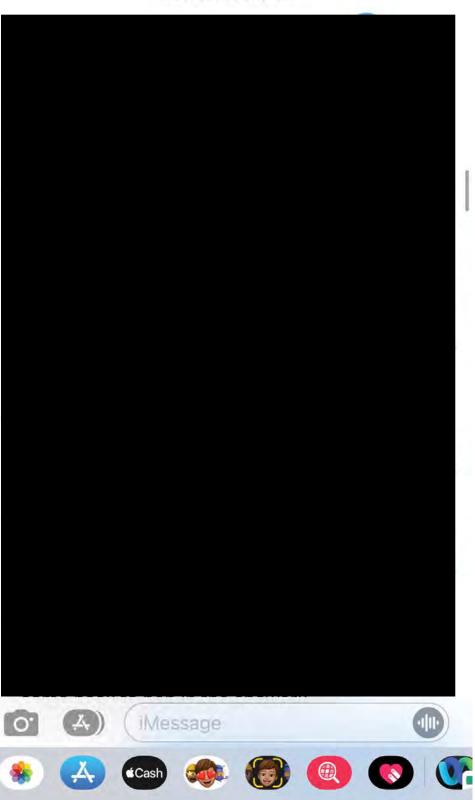






Here!

Tue, Dec 20, 7:24 AM









Sat, Dec 24, 2:06 AM

I know i shouldn't be stalking because it does nothing for my peace of mind but i AM because i cant sleep and I was hoping it'd give me a glimpse into where we are on the crazy scale... i obsessively use pinterest which he knows because i showed him how to use it over the summer and i just looked at his profile a few days ago to block him, since then he's added a whole boars of poems from MY favorite poet (the one i showed you the print from in the elevator) i feel so fucking insulted that he genuinely thinks i'm that easy to manipulate

he made the stupid board 7 hours ago

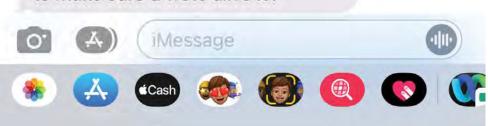
Sat, Dec 24, 10:32 AM

Girl I hope you slept in

What did he think? You'd see that and immediately decide to call him or something?? That is insulting, I agree



girl i was getting SO close to calling to make sure u wete alive lol





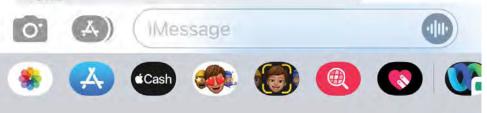
Sun, Dec 25, 6:35 PM



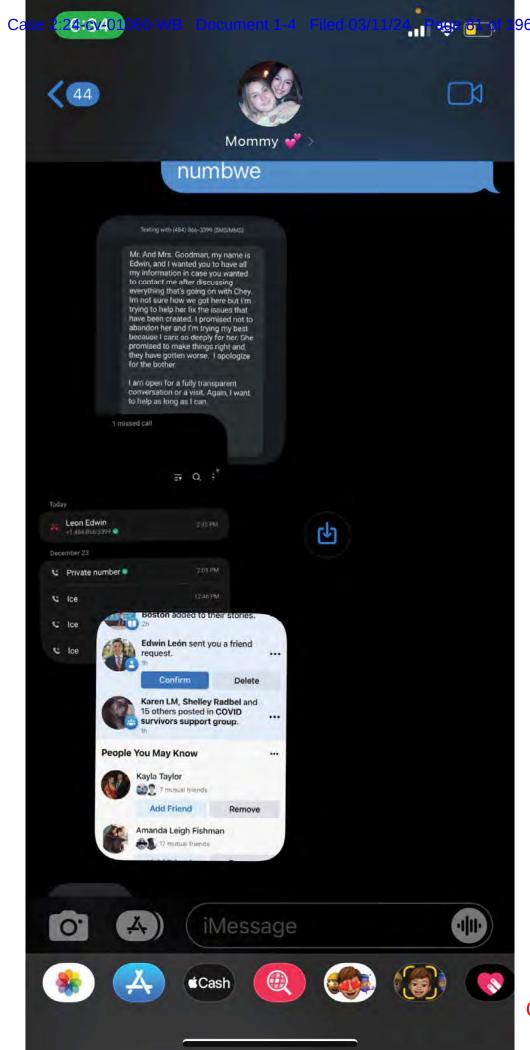
Oh my god

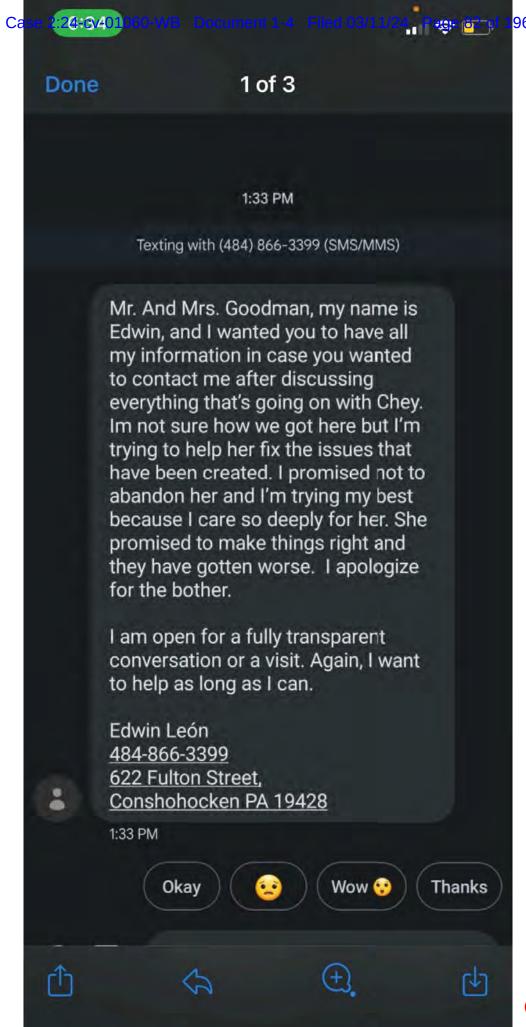
He messaged your mom or your dad?

i got a couple calls from a blocked number and i thought it might be my mom because sometimes her work phone comes up like that and it was him

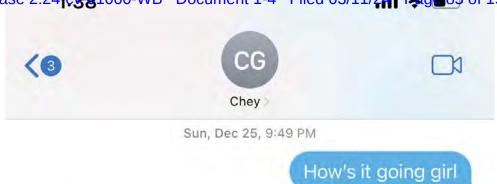


Tase ID: 230400452









ohhh its going

one new missed call but nothing else

how was the movie?

What is this number he's calling from, can you block it

Cheryl and I snuck out early to grab Chinese food

HAH thats what i just ordered, got some fried chicken so you'd have leftovers 💗

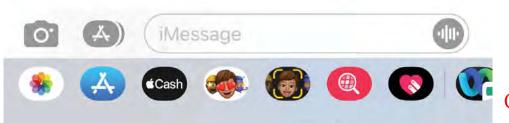
1 Reply

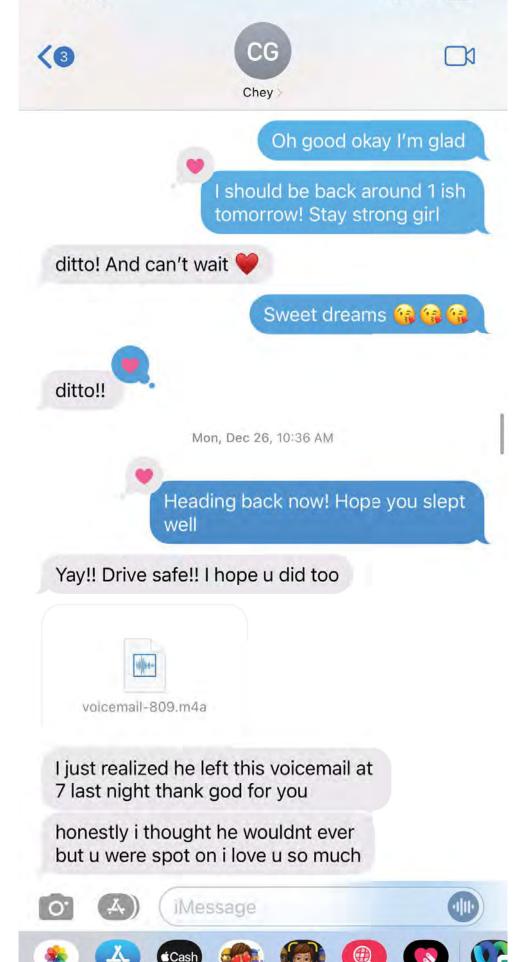
It just comes up no caller id so i can't block it, it isn't a number. I can silence unknown calls though and i did

1 Reply

i'm really curious who let him use their phone for this

Maybe his ex?









No he said he's gonna call mw back when he get to his offixe so i'm waiting

I'm just going to shower and change Then i was going to go to the bookstore

for vibes

But maybe i'll postpone that

Let's go to bookstore together

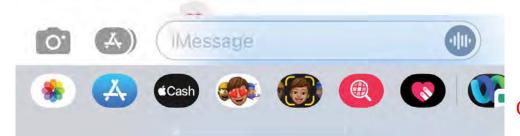
I'll be back in an hour

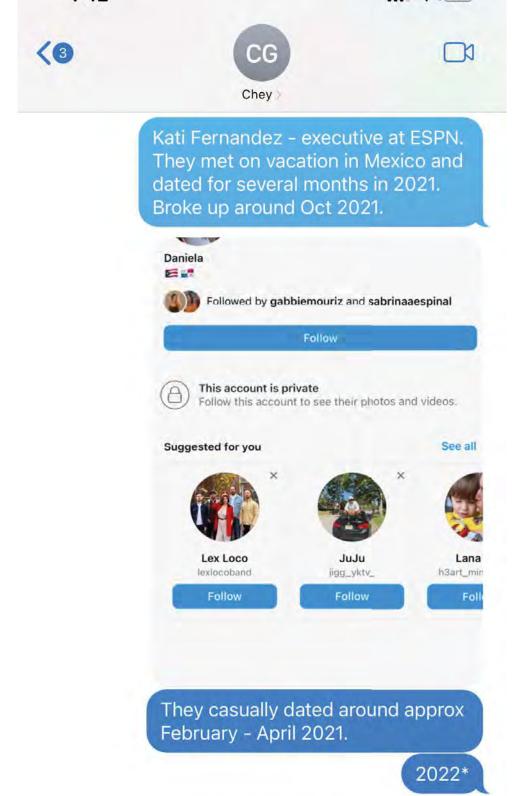
If anyone knocks on your door, don't get up to see who it is. It's definitely him

Just go to your room quietly and text Jesse

okay i will, i also put something in front of the door so he can't see the ligjr

we do not have to go to the bookstore u havw been travelling and i'm sure are tired i can shop online lol



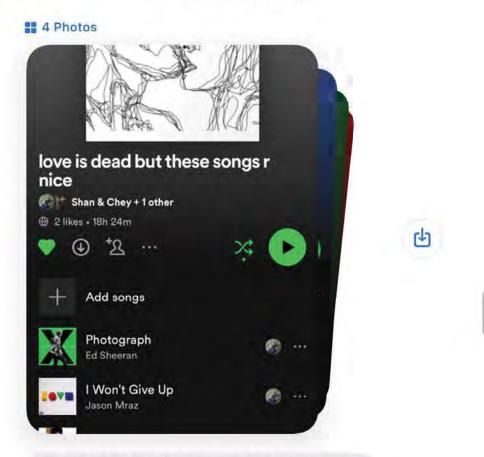


Thu, Dec 29, 11:26 AM





Thu, Dec 29, 11:26 AM



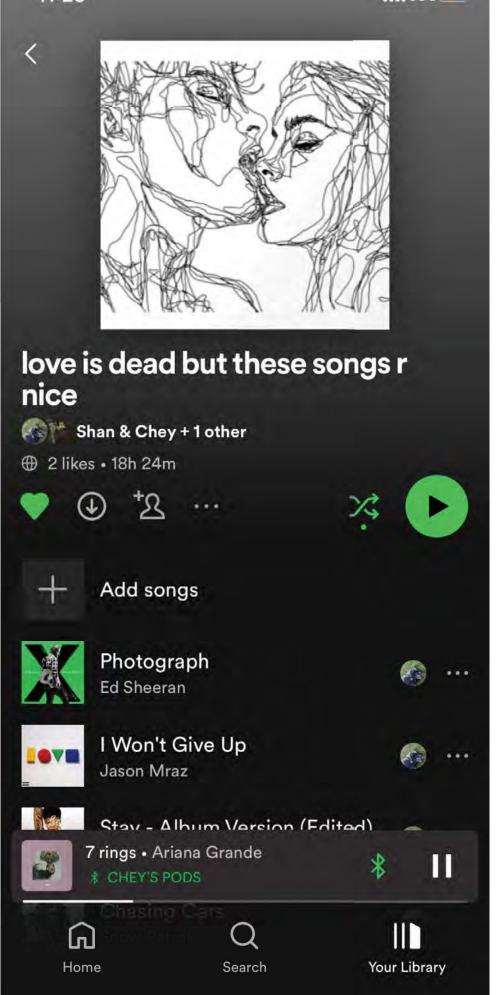
Look at the time stamps for how long the playlists are

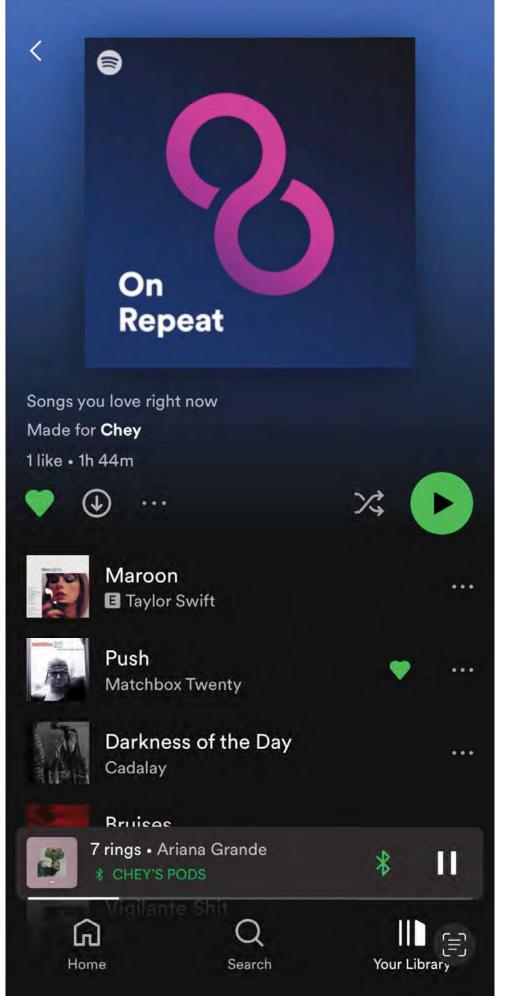
He copied them song for song, creepy as absolute fuck

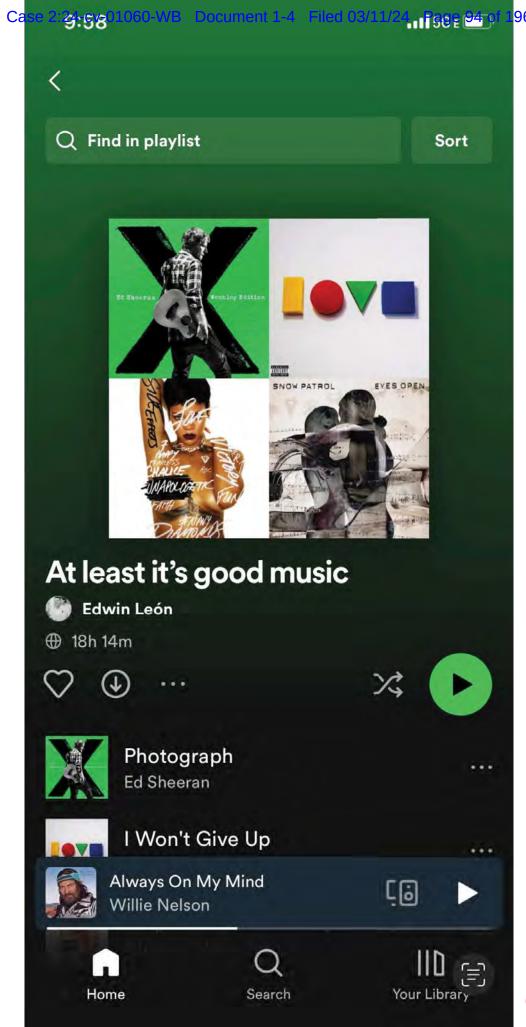


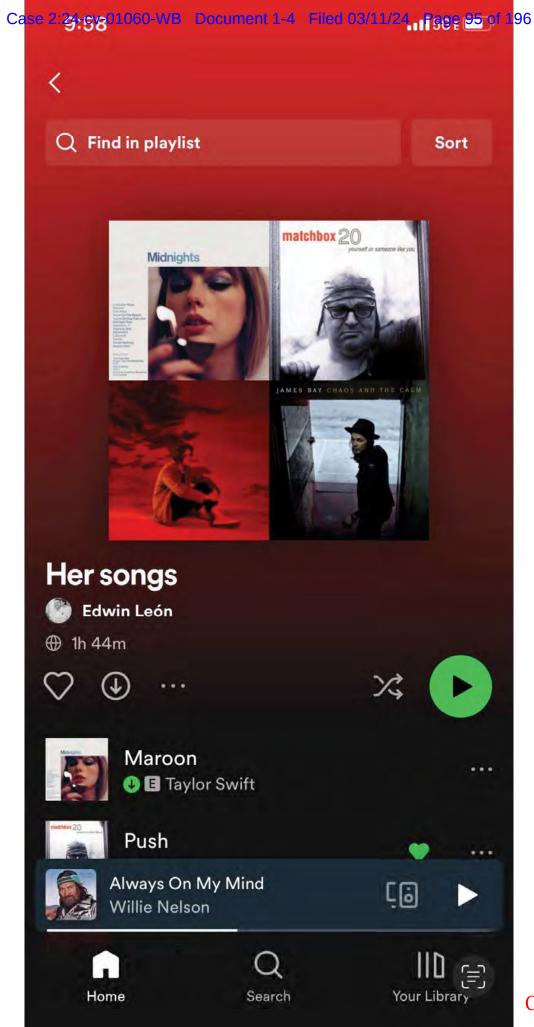
Thu, Dec 29, 12:51 PM

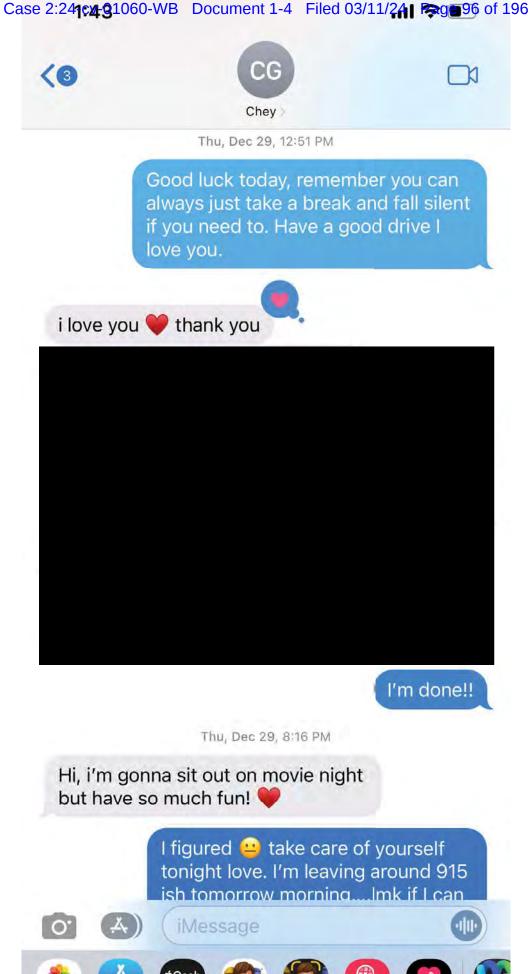














Fri, Dec 30, 10:11 AM

Hi! Sorry i slept all the way through my alarms

Good I'm glad you slept

We're on the train now but I'll see you when I get back on Sunday night if you're around

I wanted to ask you something

Aw okay well i hopw u have the best time!! Whats up?

Also yes i'll be around

After your PFA is served, I was wondering what you think about me calling that girl from DC and telling her not to contact Edwin anymore. I wouldn't give her details, I would just say he's dangerous and you have a PFA, because I don't want her in his orbit. But if that would in any way make things more difficult or even just uncomfortable for you, I won't.

Be honest with me

i think thats a great idea, and also you





















i think thats a great idea, and also you have such a kind heart

Okay great

Let me know once you have the PFA server. I'd rather wait until then

Served *

i will, i'm going today as soon as the VS lady is free to fill out the paperwork and i think it'll be today or tomorrow

Did they say if you would have to appear at a hearing?

They said it'll be up to the prosecutor and judge so we'll see

Okay, fingers crossed for you

What are you thinking of doing today

well i'm talking to the vs lady at 11:30 then i have to drive to norristown to actually put in the paperwork

what are your big nyc plans!!

Okay feel free to go into my apt to





iMessage

















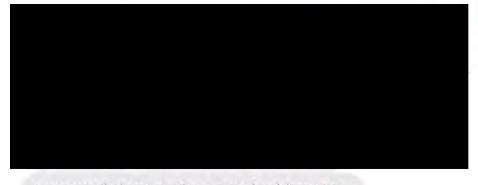




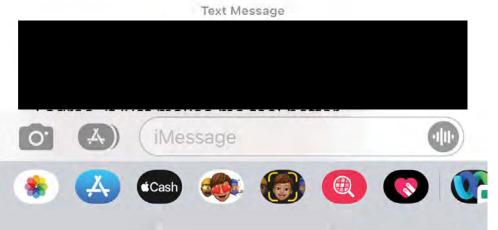
I just thought of this—it looks ridiculous for Edwin to file assault charges against u and then CALL u

It is so ridiculous. I'm really not worried about this assault thing — he and I both know I didn't assault him and he really doesn't want me to explain why I had to yell at him that

night in a public courtroom

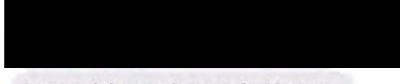


I agree, it just makes me feel better about him not having anything to threaten u with because we all know it's bullshit





Text Message



I agree, it just makes me feel better about him not having anything to threaten u with because we all know it's bullshit

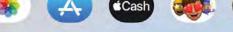
iMessage

Definitely don't worry about me

Sat, Dec 31, 1:24 PM











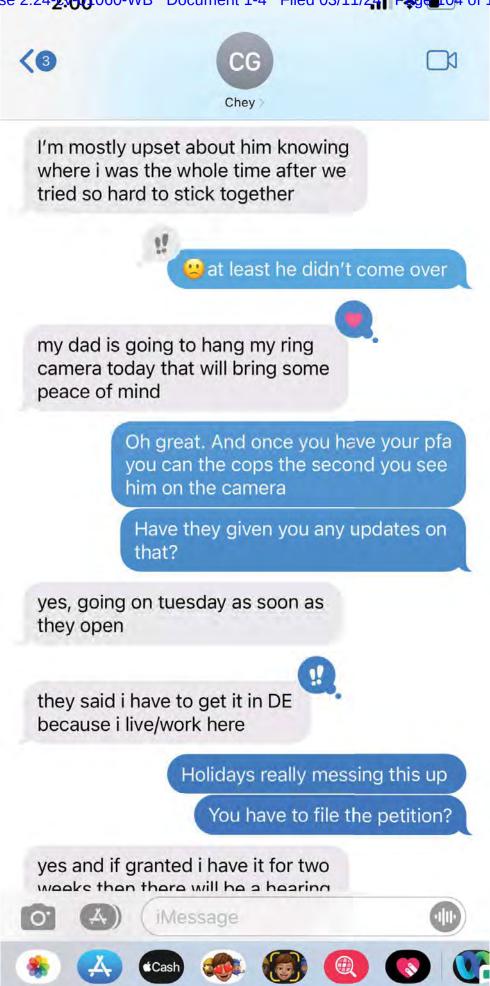














yes and if granted i have it for two weeks then there will be a hearing where he can contest it becoming permanent

Okay damn that's not as seamless as they had originally made out

no it's really not

but it's the only option

Let me know if you want any help with it. I think the more detailed and clear the petition, the more likely you will get it without a hearing

Really emphasize how dangerous it was for you to leave

So that the judge understands the position you are in here

I'm getting odly conflicting advice on that, the detective said include everything but the woman i called in the delaware victims services group said that you should do the most recent thing because the judge is less likely to grant if it's just a ton of info over a long period of time

Oddly* jesus





Message











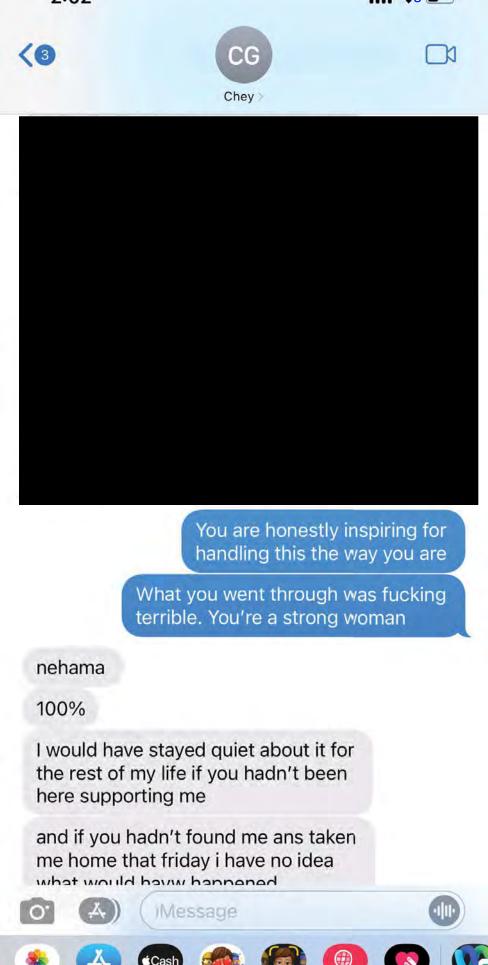


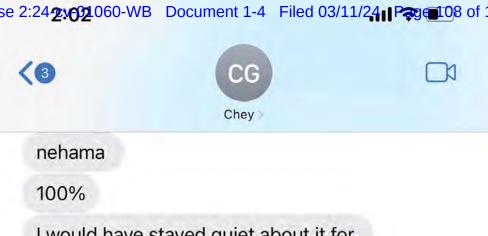












I would have stayed quiet about it for the rest of my life if you hadn't been here supporting me

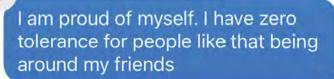
and if you hadn't found me ans taken me home that friday i have no idea what would havw happened

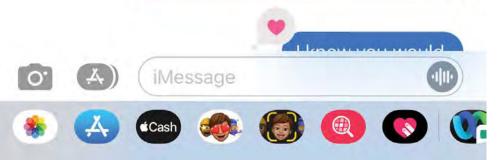
> You asked me for help that night, that's all you. You gotta give yourself credit for that. I'm always here to support you every way I can

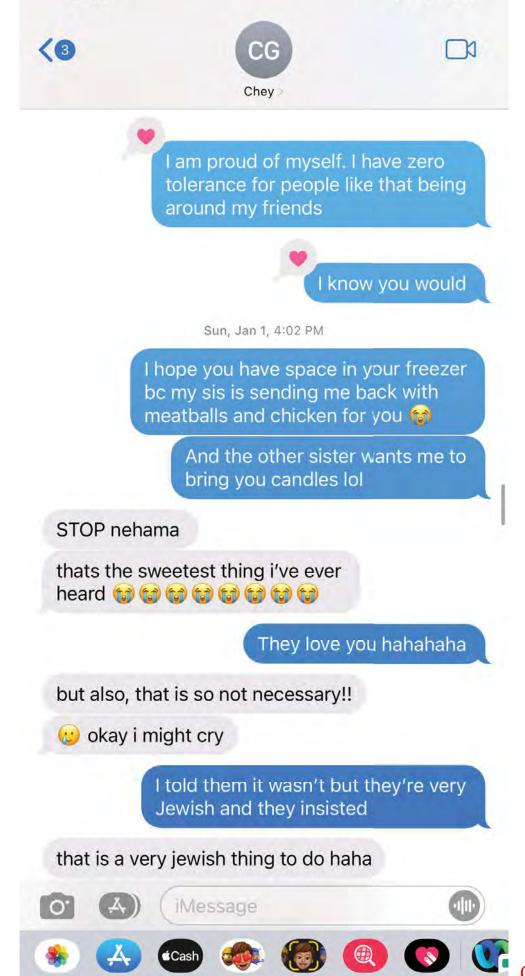
you're inspiring and i hope you feel as proud of yourself as you are of anyone because i'm so wildly grateful and in awe of you

ditto, i hope you know i'd return the favor 100%



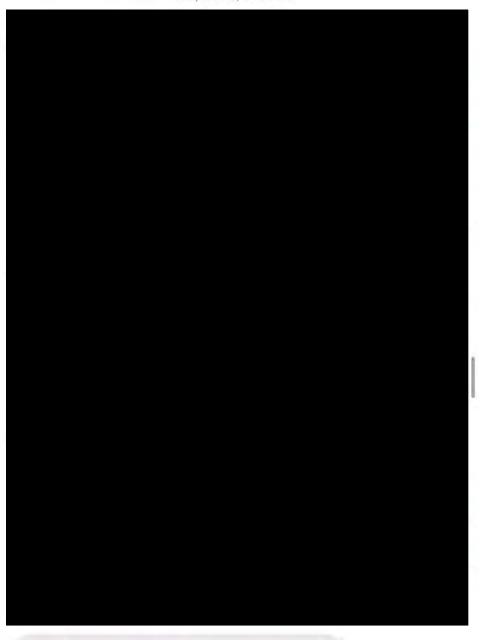




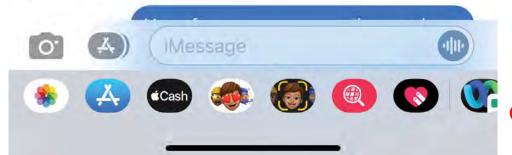


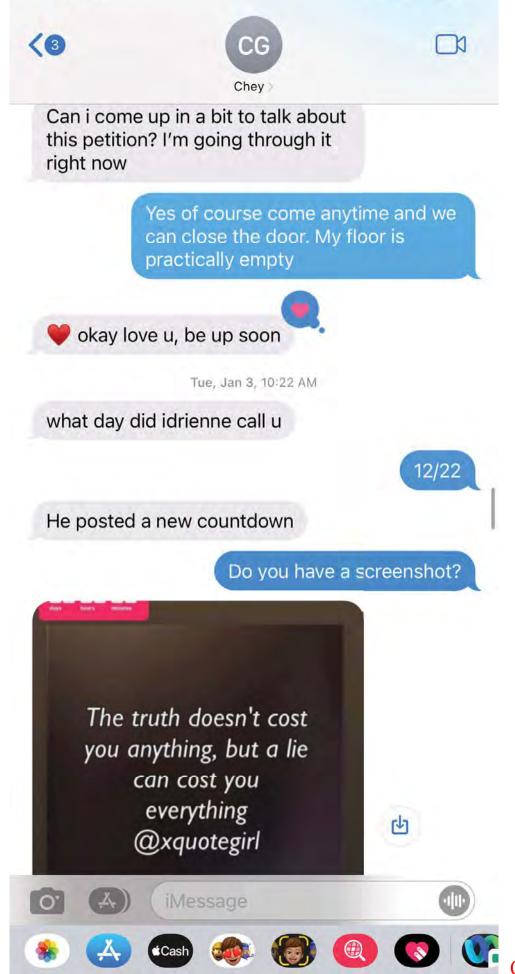


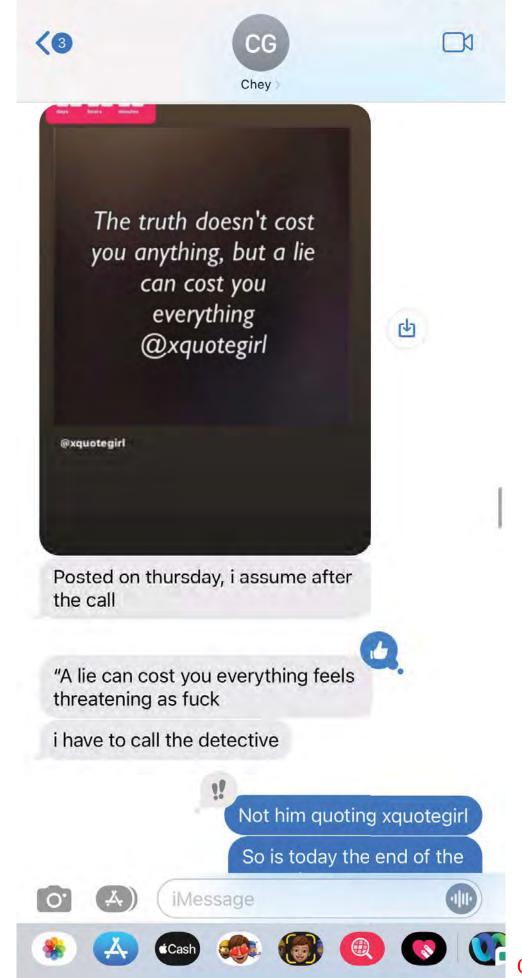
Tue, Jan 3, 6:55 AM



Can i come up in a bit to talk about this petition? I'm going through it right now







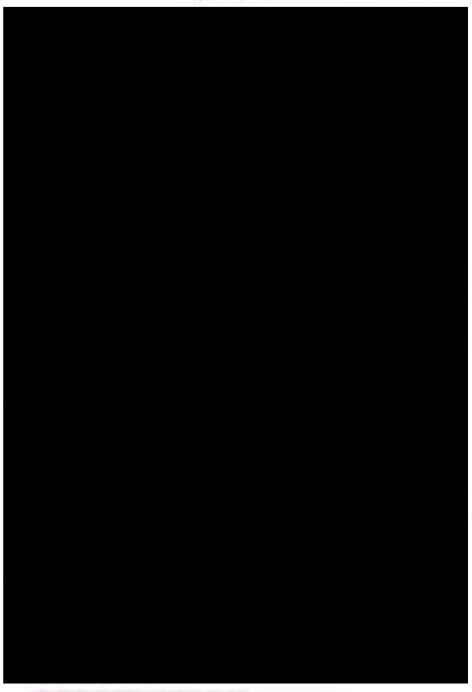




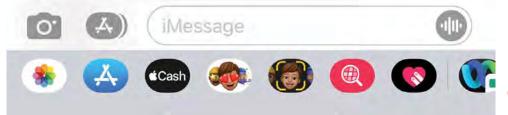




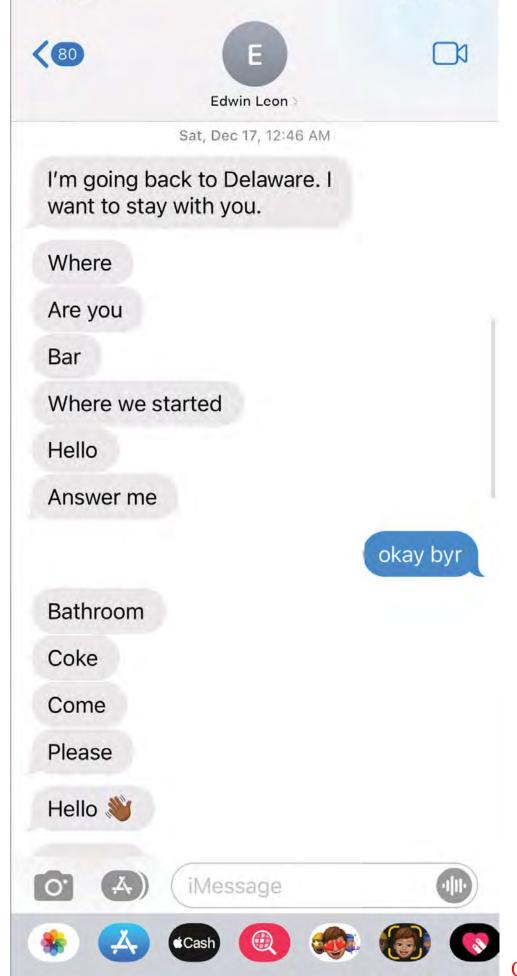
Thu, Jan 5, 11:06 AM



I'm going back to Delaware. I want to stay with you.















he fully said on the call he had every intention of leaving me alone after i got home safe fuck him so fucking much

Include that in the PFA or the police report?



in the PFA but i did include the he messaged me alot and wanted to go home together

Not legal advice, but I think that sounds like enough

He's so fucking demanding in these messages how dare he

i hate him so much it makes me literally want to cry because there's nothing i can do about it and i know he'll refuse to agree to a consent order just to make me have to see him at a trial

You already ARE doing something about it Chey. You are in control here. If he wants to go on public record and have all of this evidence out in the open in Delaware, that is





iMessage

















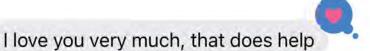




You already ARE doing something about it Chey. You are in control here. If he wants to go on public record and have all of this evidence out in the open in Delaware, that is just as much a hit for him as the pain of a PFA trial would be for you

Try to think of it as you are dragging him to court, not the other way around. You are in charge now

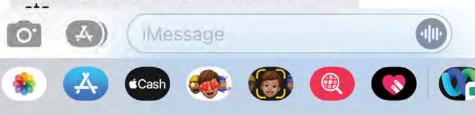
I don't think he'll think about it, i think he's spiteful and he'll care more about hurting me than he will about his own reputation

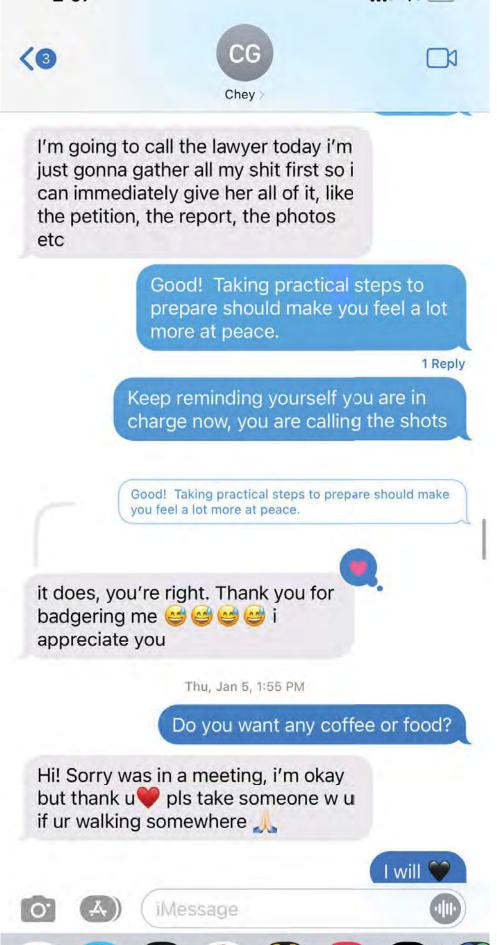


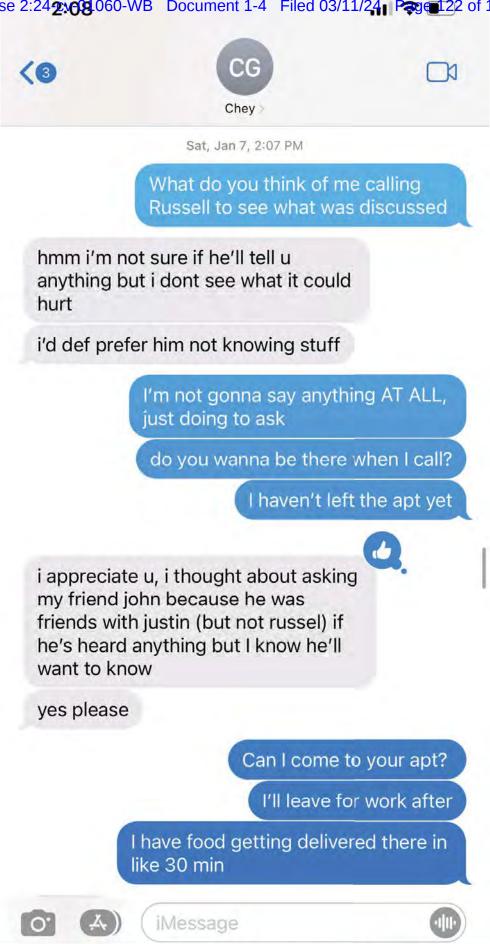
Well then you are going to his his spitefulness against him, he is his own worst enemy

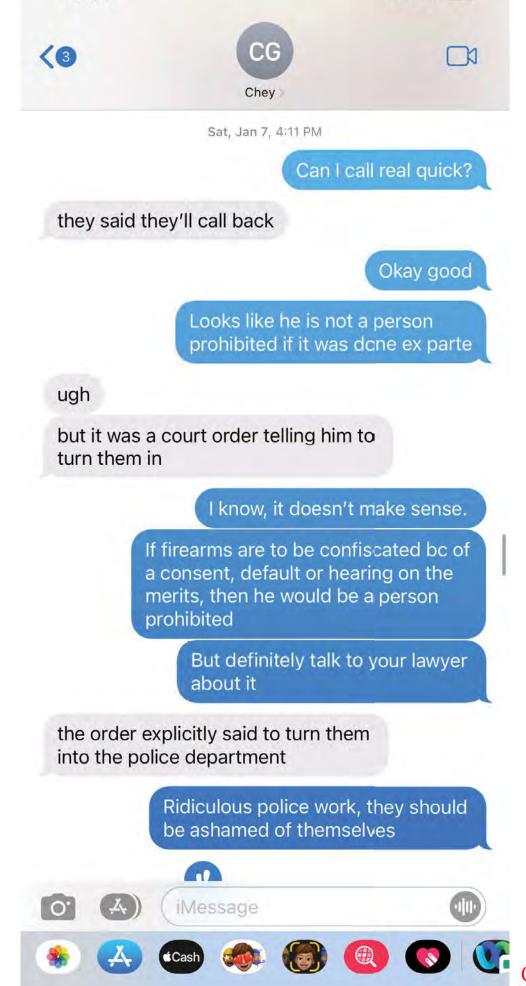
Use his*

I'm going to call the lawyer today i'm just gonna gather all my shit first so i can immediately give her all of it, like the petition, the report, the photos













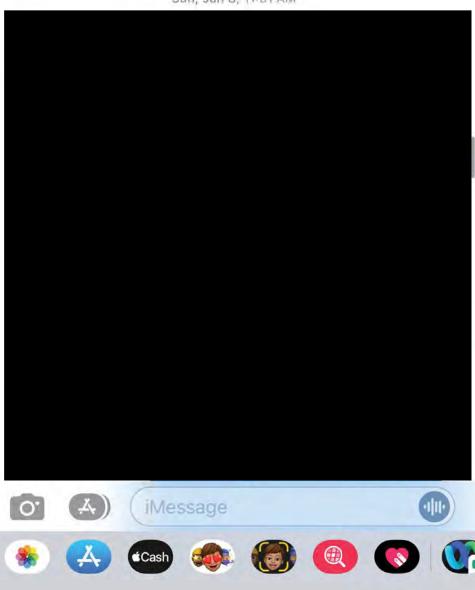
Especially if Evie is holding them, she's literally right down the block

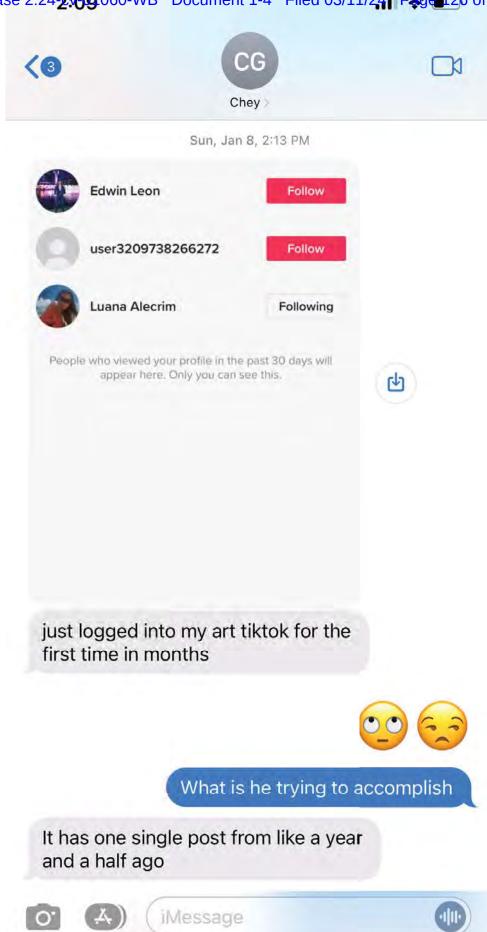
And he's her landlord isn't he? He prob can get in whenever he wants

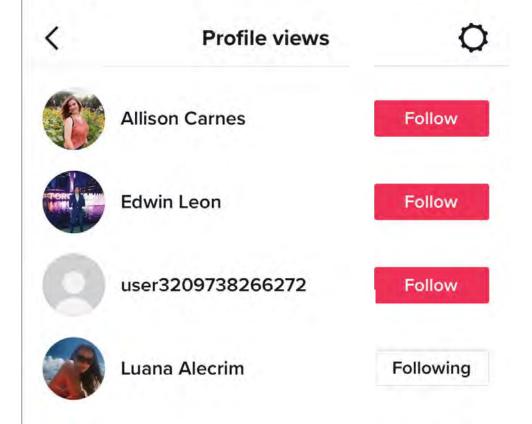
yeah and she lives next door to him now it's not even a walk

Jesus

Sun, Jan 8, 11:01 AM

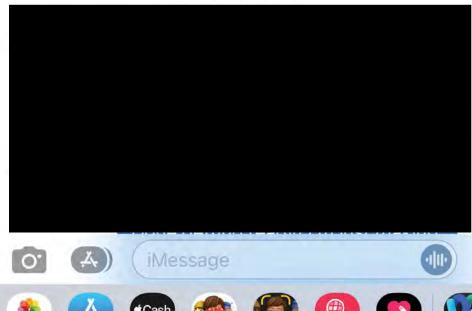


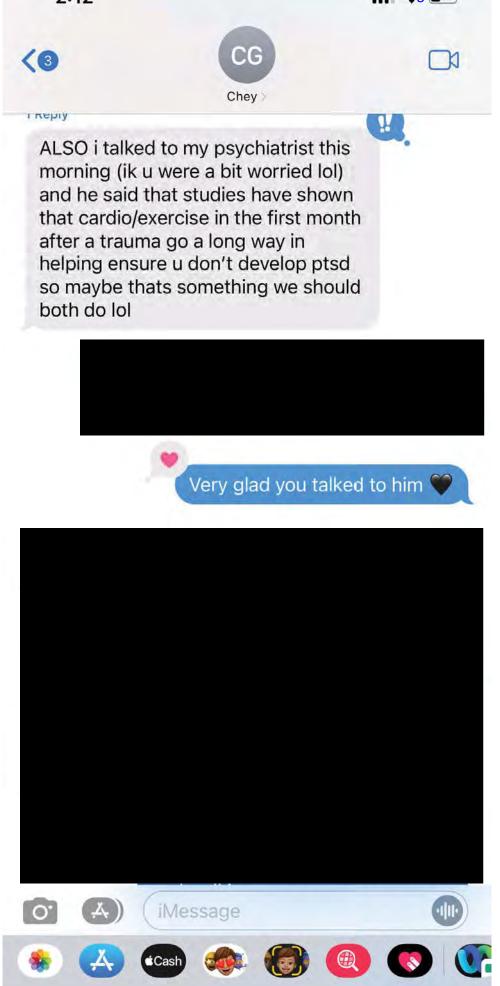


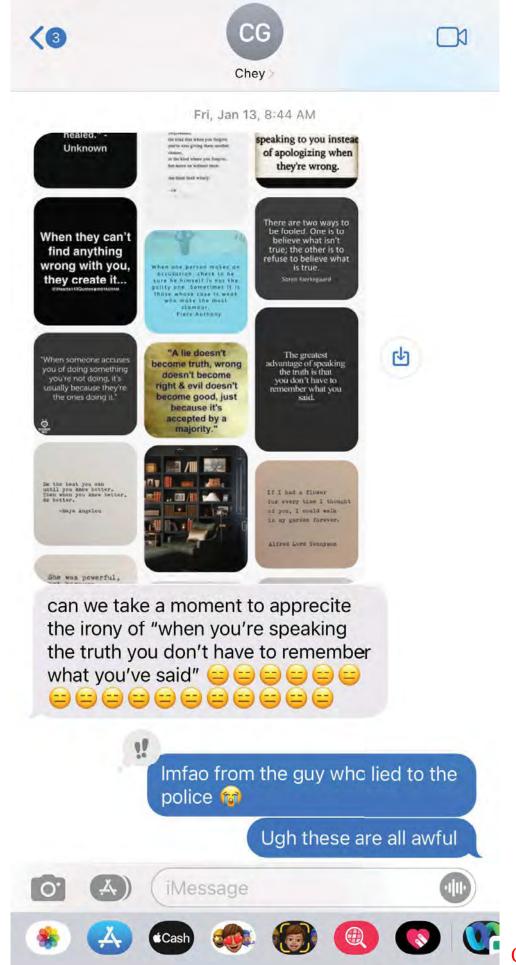


People who viewed your profile in the past 30 days will appear here. Only you can see this.









<

All Pins

"When one forgives, two are healed." -Unknown

I think there are two kinds of forgiveness, the kind that when you forgive you're also giving them another chance, or the kind where you forgive,

but move on without them

use them both wisely.

You ever notice people would rather stop speaking to you instead of apologizing when they're wrong.

When they can't find anything wrong with you, they create it...

When one person makes an accusation, check to be sure he himself is not the guilty one. Sometimes it is those whose case is weak who make the most clamour.

- Piers Anthony

There are two ways to be fooled. One is to believe what isn't true; the other is to refuse to believe what is true.

Soren Kierkegaard

"When someone accuses you of doing something you're not doing, it's usually because they're the ones doing it."

Ö

"A lie doesn't
become truth, wrong
doesn't become
right & evil doesn't
become good, just
because it's
accepted by a
majority."

The greatest advantage of speaking the truth is that you don't have to remember what you said.

Do the best you can until you know better. Then when you know better, do better.

-Maya Angelou

If I had a flower
for every time I thought
of you, I could walk
in my garden forever.

Alfred Lord Tennyson

She was powerful, not because she wasn't scared but because she went on so strongly, despite the fear.

-Atticus

I'm going to make everything around me beautiful that will be my life.

-Elaie de Wolfe

I don't know
where I'm going
from here,
but I promise
it won't be boring.

-David Bowie

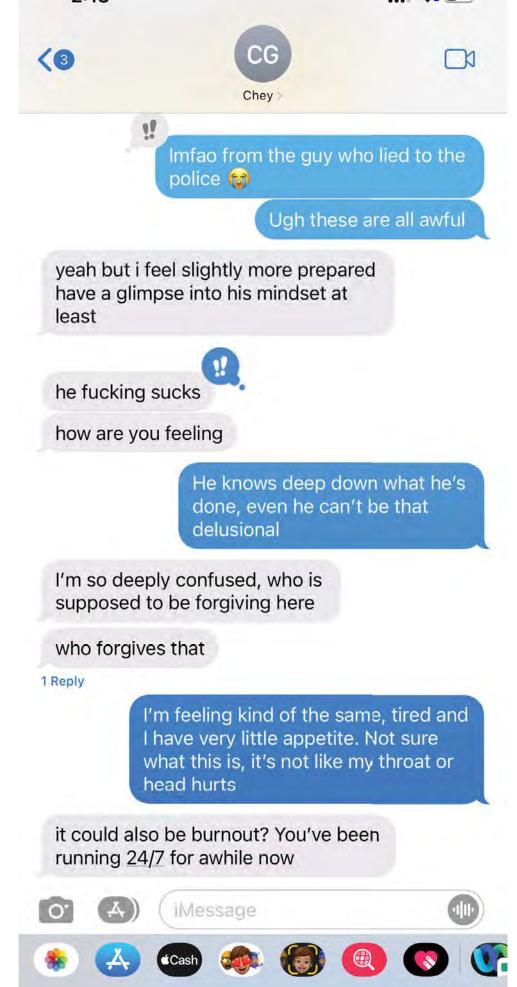




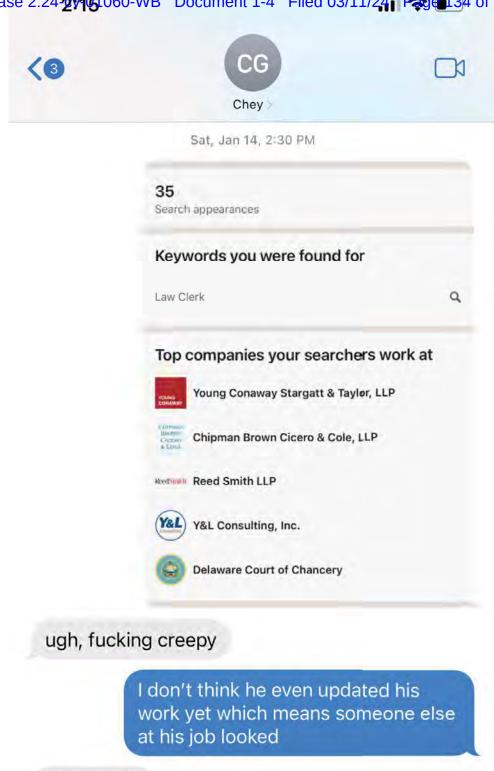




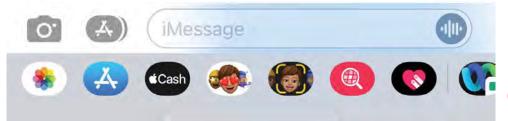








thats... odd maybe it was just a recruiter? or maybe he spoke to his firm





Search appearances

How often your profile appeared in search results between January 3 - January 10

35

Search appearances

Keywords you were found for

Law Clerk

Top companies your searchers work at



Young Conaway Stargatt & Taylor, LLP



Chipman Brown Cicero & Cole, LLP

ReedSmith Reed Smith LLP



Y&L Consulting, Inc.



Delaware Court of Chancery

Top job titles of your searchers

Partner · 14.3%













thats... odd

maybe it was just a recruiter?

or maybe he spoke to his firm

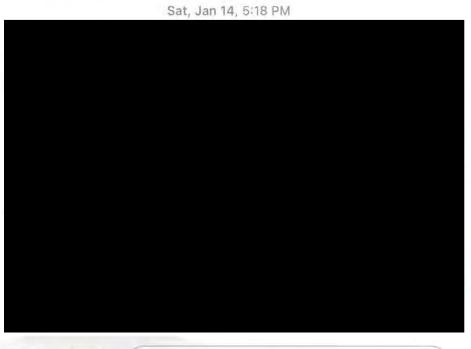
I feel like he must have said something, it's too weird

I'll check mine too when i'm home

What would he even say

I don't know, probably trying to get ahead of things

He's ridiculous







iMessage









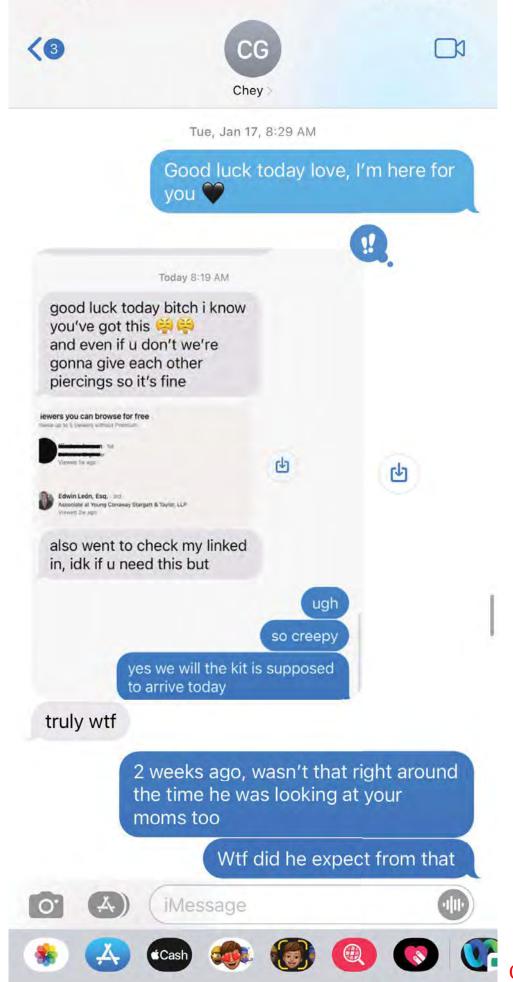


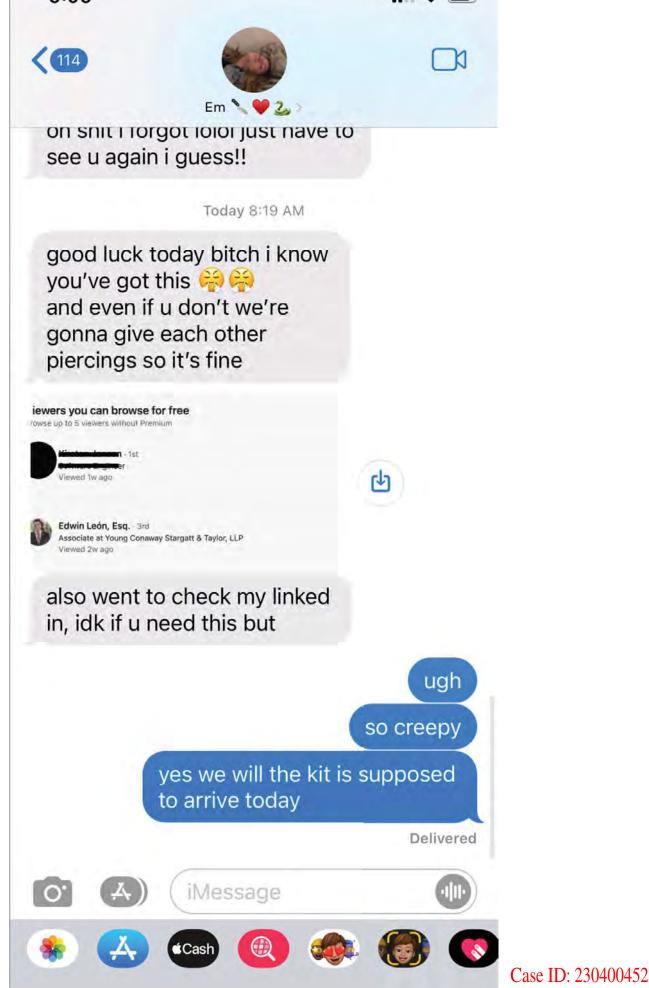




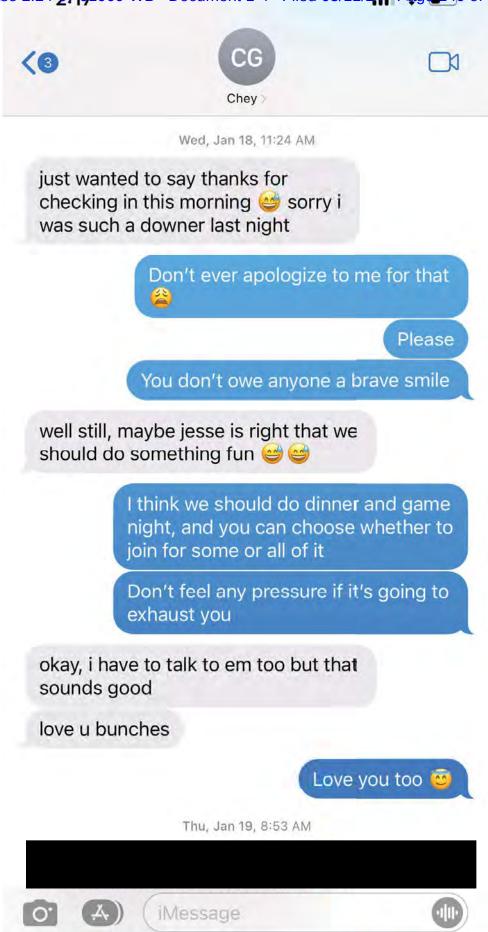






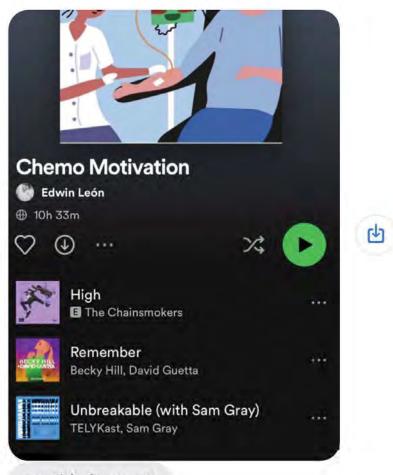








Mon, Jan 23, 8:37 PM

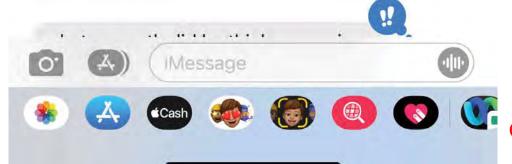


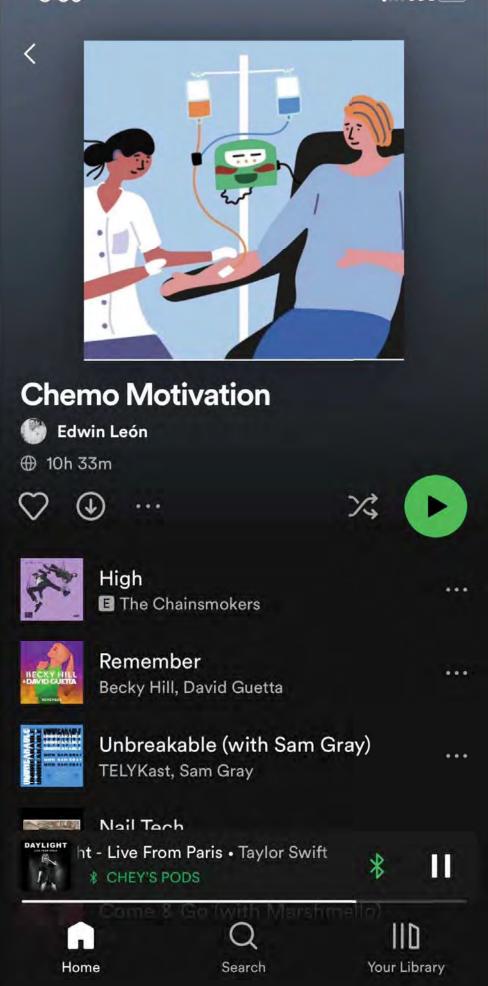
so, this is new?

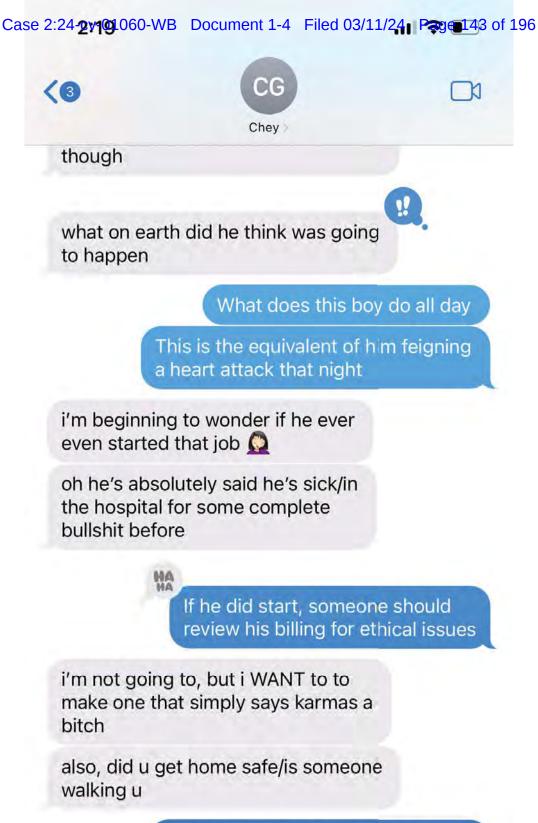
Wtf

That is some manipulation on crack

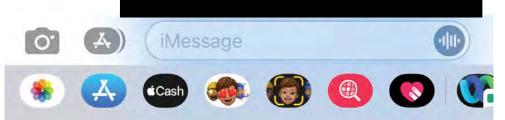
he deleted most of mine that he copied, he did copy my study playlist though





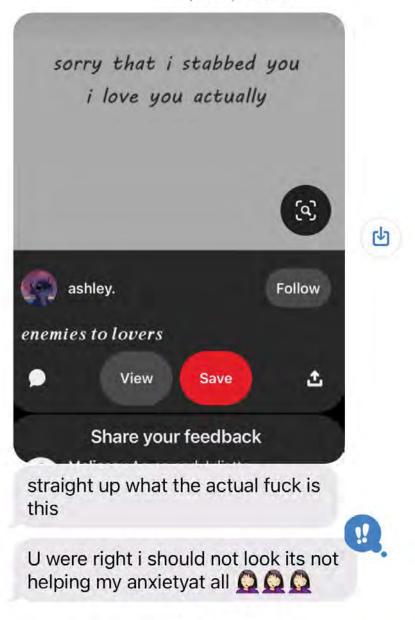


Hell they're gonna read through our texts anyway



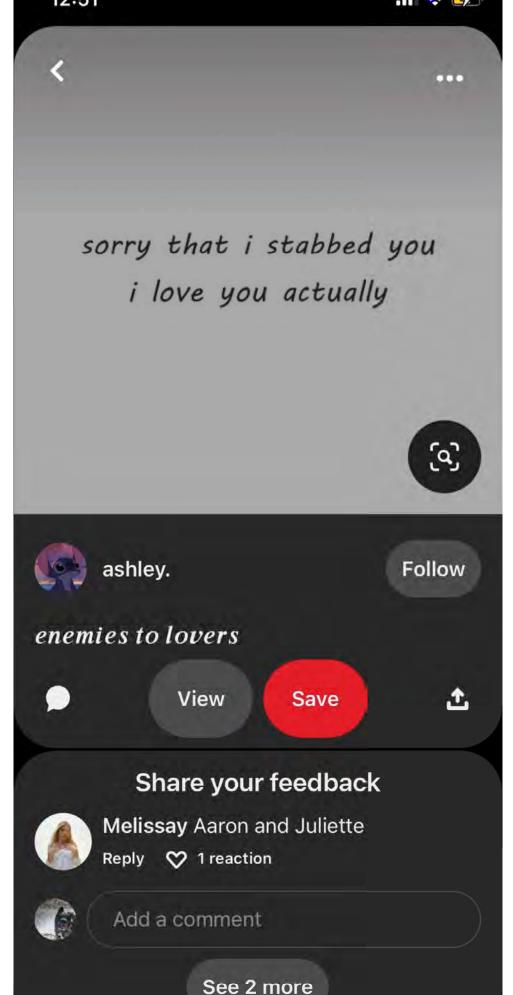


Fri, Feb 3, 12:53 AM



Fri, Feb 3, 7:39 AM





Case ID: 230400452



He hasn't stabbed me 😭 😭 😭 so he literally just thought it was funny

i mean yes obviously im still alive no one has ever stabbed me

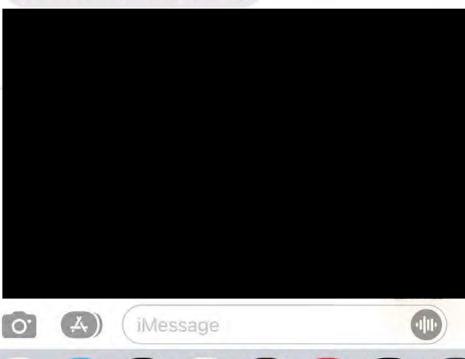
I'm just saying, cracked sense of humor

Fri, Feb 3, 9:21 AM

Cracked sense of humor is a nice way of putting it

I'm betting he couldn't find one that covered the fucked up things he actually did

that would be quite a thing



















ME

I love you so much It's crazy how much I love you Filed and Attested by the Office of Judicial Records
13 DEC 2023 01:13 pm

CHEY GOODMAN

okay but also i want to have sex with you rn

ME

Let's make that happen baby

CHEY GOODMAN

okay different name though

ME

You'll always be my good girl

CHEY_GOODMAN

christ say that again

ME

You're my good girl And you deserve it all

CHEY_GOODMAN



ME

I want you I want to hold you And love you ME

You're my good girl And you deserve it all

Filed and Attested by the Office of Judicial Records
13 DEC 2023 01:13 pm
C. PERRY

CHEY GOODMAN



ME

I want you I want to hold you And love you

CHEY_GOODMAN

okay but also other stuff

ME

And then punish you in the best ways

CHEY_GOODMAN

better

ME

Wrap my hand around your neck and make love to you until Your legs shake and you're begging me for everything

TODAY

02:03





chey_goodman





Not as Hot as you I can't stop staring I'm trying lol The things

CHEY GOODMAN

the things?

Love the view

The things running through my mind

CHEY_GOODMAN

Like?

ME

You

Laying back wearing that skirt

Rope

Whips

My hands around your neck as I work your skirt up

CHEY GOODMAN

that made me stomach flutter

ME

I want do the things that make you dream about the seconds until it happens again The fear of how good it feels to do the bad things we can only talk about in the confines of our minds and our room



'Send a chat















Sat, Dec 17, 8:58 PM



Hey! How are you doing?

The adrenaline finally work off I think. I'm so exhausted I'm gonna go to bed

But honestly not good

I'm really worried about chey and also a little bit myself bc I flew off the handle at him and I know that hit a nerve for him

I am really still in shock. I'm so sorry both you and chey had to go through all that. I hope chey is okay because that sounds so traumatizing and having to work with him is really no okay at this point. You know we have your back and we are going to be there for you no matter what.

Thank you so much girl you don't even know how much it means to me that you're so supportive

I hope chey gets herself some good counseling

His last day is in 2 weeks but no way are we letting him set foot in the firm

I'm worried he like cavually accoulted









I am really still in shock. I'm so sorry both you and chey had to go through all that. I hope chey is okay because that sounds so traumatizing and having to work with him is really no okay at this point. You know we have your back and we are going to be there for you no matter what.

Thank you so much girl you don't even know how much it means to me that you're so supportive

I hope chey gets herself some good counseling

His last day is in 2 weeks but no way are we letting him set foot in the firm

I'm worried he like sexually assaulted her I really hope she is able to talk to someone about what happened so that she doesn't hold it all in.

And then for him to basically threaten her with filing something against you is so wild

Me too. He was clearly trying to assault her in the bar

I wish I hadn't let her out of my sight













Sabilia

I wish I hadn't let her out of my sight

I know you do because you're an amazing friend but you did the best you could. No one could have predicted how crazy Edwin truly is.

Has Jesse been able to talk to chey and get her to talk to HR or her family?

Sun, Dec 18, 10:31 AM

Jesse and I both talked to her yesterday morning and she said she was going to talk to her parents before deciding anything



But I don't think there's a way around talking to HR tomorrow morning. I need to make sure I'm safe too, which means Edwin can't be allowed in the building for the next two weeks before he leaves

He's definitely mad at me for intervening and I don't feel safe with him around

Sun, Dec 18, 11:57 AM

1000% especially since it's gone way past the events that happened that night with now him threatening to file stuff against you. You gotta be safe













Sun, Dec 18, 11:57 AM

1000% especially since it's gone way past the events that happened that night with now him threatening to file stuff against you. You gotta be safe too

Yeah exactly and chey agrees with that too. I'm meeting with the head of the firm at 4 today to talk

Have you thought about what you are going to say?

Oh yea it's very complicated and depends a lot on what chey is willing to have out there

I'm talking to chey in a few hours about it

That's good so you guys will be on the same page just in case the head of the firm contacts Edwin. Who knows what he's capable of rn.

Sun, Dec 18, 7:25 PM

Do you still have Edwin on ig? If so can you watch his story real quick

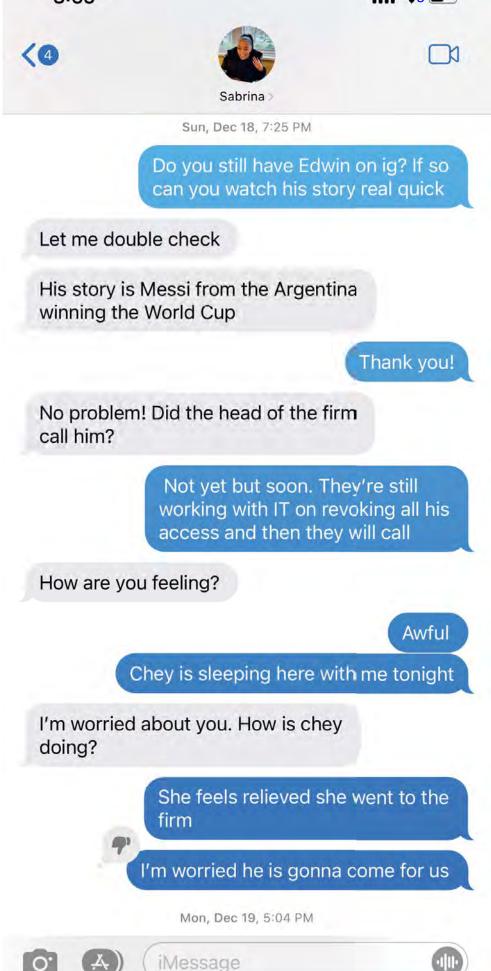
Let me double check

His story is Messi from the Argentina









Case ID: 230400452







Mon, Dec 19, 5:04 PM

I can't even imagine. I'm really still in shock. Has he been threatening her?

I can't talk about this over text anymore

Okay I'll call you after I finish this notice of commencement. I'm so worried about you. This is scary

Let me call later tonight. I'm doing something right now!

Okayy sounds good!

Tue, Dec 20, 5:18 PM



Oias Paudval on













Thu, Dec 22, 4:08 PM



I don't wanna say much over text but I just want to say that I am very very sorry you and Alex are getting dragged through this at all. I know it's not fair to either of you. I also want to keep Alex far away from it

It's okay! I just love him so so much so I never want him involved in anything where neither him nor I know the details of or info, and serious things are happening. I'm just so protective over him. I really hope that this was just a one and done thing with Edwin because he's going to leave me no choice but to be like back off from Alex.

Idk I just feel like Alex should be off limits so I don't understand why message him out of the blue.

I agree Alex should be off limits. Has he message Alex back?

Not that I know of. I was just on the phone with him and Alex didn't say anything.

Okay good, hopefully he doesn't involve him at all









Mon, Jan 2, 1:28 PM

Have you heard/seen anything about some kind of countdown on Edwin's story

He may have but I'm not sure because I usually don't look closely at stories of ppl I'm not close to.

Oh wow that's perfect timing for you though isn't it



Exactly which may be perfect for us so I'm excited

It'll depend on the kitchen tho because I can't tell the color

Like the color of the countertops??

Is it a 1 or 2 bed?

Im hoping it may be white with black but I can't tell if it's actually dark brown

Brown seems unlikely

White with black sounds pretty

Can I call you real quick?









Hey. So Edwin was served with an emergency ex parts PFA tonight. I'm going to talk to Idrienne soon to let her know too. I just wanted to let you know

Parte *

Tue, Jan 3, 10:42 PM

Hey! Okayy

Sun, Jan 15, 10:39 AM

Was that you I just saw lol

Yes Imfaoooo

I'm getting some water from my moms car

Omg my bad

I was in a rush to get out I'm going home for my moms bday

I haven't seen you in forever

Or Gabbie lol

I know I've been gone for long lol. I literally just got back last week on Monday night in a rush to see the apartment in jersey. Then my mom came Friday so she could see it and













Tue, Feb 14, 11:25 PM

Hey can I ask a favor

Hey yes what's up?

Can you and Alex please block Edwin from anything you have him? I really don't feel comfortable with him being able to have any kind of access to mine or Chey's life, even if it's very remote. And I also want edwin (and chey) to know that he does not have your support

I think he's taking the fact that you guys still follow him to mean that you don't know what's going on or don't have an opinion on it

Yea I will explain things to Alex and let him know



It means a lot to me thanks girl

Yea of course no problem! Alex is here so I will talk to him and let him know what's been happening.

> Okie tell him whatever you feel is necessary, its probably easier if he understands why













DISTRICT OF

Okay good 🌹love you!!

Love you toooooo!

Sat, Dec 17, 2:52 AM

Hey text me when you're up in the morning, we gotta talk.

Edwin crossed the fucking line tonight and I will not stand for this anymore. We lost track of chey at the end of the night and I tried texting her bc I was worried she was with Edwin. She she called me that he was chasing her down the street. We found her crying on the street. I tried to punch and kick him and told him I was going to kill him . She was sobbing uncontrollably and scared all night as we took her home. I'm still shaking and I know it would mean a lot to her to get some comfort from you. But let me know when you're up. Sorry for the weird text

I can't stop shaking Jesse I want to fucking rip his limbs apart and gouge his eyes out and torture him

Sat, Dec 17, 6:07 AM

I'm sorry dear. My phone apparently updated last night and never









Sat, Dec 17, 6:07 AM

I'm sorry dear. My phone apparently updated last night and never restarted

I'm processing. Let me take Fen for a quick walk and then I can swing by whenever you want to chat.

You still up?

Hey I just woke up, I fell asleep around 4 am

Chey came by to talk. Can we come over?

Can I come to you in 5? My place is a mess still .

Of course

Okay I'm just making coffee really quick

Cool

Sat, Dec 17, 11:55 AM

Can I come over real quick?

Or call you









Call

Sat, Dec 17, 1:50 PM

Have you heard from chey? When I called her at noon, she was getting into the parking garage. I wanna make sure she got home safely and she hasn't answered me

I haven't since the group chat.

Okay I'll give her about 30 more minutes and then I'll call. I don't wanna blow up her phone all day and stress her

Sounds good. Yeah, agreed.

Sat, Dec 17, 3:00 PM

I tried calling and texting her 30 min ago and haven't heard. Think she's just with her parents and she's busy talking to them?

She's okay she's with her mom



Sat, Dec 17, 4:38 PM

You doing ok?









Sat, Dec 17, 4:38 PM

You doing ok?

I'm just waiting for the adrenaline to die down still. Just got some food bc I barely ate

I couldn't catch Brennan but I did talk to concierge to put in an alert not to let Edwin in and I gave them a picture of him

I'll talk to the front office on Monday

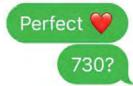
Yeah, processing food can help your body mellow out the adrenaline high.

Ok, cool. That's good.

Anything I can do for you?

Can we do movies and fen cuddles tonight

Yep. Sounds like a plan.



Sounds good 💗

Sat, Dec 17, 7:30 PM



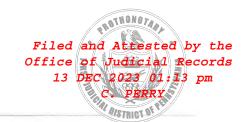




From: Grear, Craig cgrear@ycst.com

Subject: CONFIDENTIAL

Date: Dec 18, 2022 at 19:33:02 To: edwin.leon21@yahoo.com



Edwin,

I attempted to reach you by phone, but was directed to a voice mailbox that was indicated as full.

We are in the process of investigating certain matters that have been brought to my attention. While we investigate these matters, please be advised that we have suspended your access to Young Conaway's IT systems and deactivated your building access card. In addition, building security has been instructed that you are not to be permitted access to Young Conaway's offices.

In light of your pending departure from Young Conaway, please refrain from coming into the office or contacting firm personnel as we look into the matters that have been brought to my attention. In this regard, please direct any communications to me as general counsel of the firm.

You will be paid by the firm through December 31, 2022, the effective date of your resignation from the firm. Please contact me if you would like to arrange a mutually convenient time to retrieve any personal items you may have in your office. Alternatively, we can arrange for packing and shipping such items to you.

I am available to discuss any questions you may have.

Thank you,

Craig



Craig D. Grear, Partner and General Counsel
Young Conaway Stargatt & Taylor, LLP
Rodney Square, 1000 North King Street
Wilmington, DE 19801
P: 302.571.6612
ggrean@yest.com | www.youngconaway.com | yCard

This message may contain confidential attorney-client communications or other protected information. If you believe you are not an intended recipient (even if this message was sent to your e-mail address), you may not use, copy, or retransmit it. If you believe you received this message by mistake, please notify us by return e-mail, and then delete this message. Thank you for your cooperation.

ML&T

McMAHON, LENTZ & THOMPSON

ATTORNEYS AT LAW

John I. McMahon, Jr. Erin C. Lentz-McMahon Brooks T. Thompson

June 29, 2023

Filed and Attested by the Office of Judicial Records (1959-2004) 13 DEC 2023 01:13 pm

Edwin Leon 622 Fulton Street Conshohocken, PA 19428

Re: Edwin Leon / Criminal Investigation

Dear Mr. Leon:

I am writing with respect to our representation of you relative to the Plymouth Township Police Department criminal investigation in which you were a prior subject, relating to allegations of sexual assault. Based on your oral interview to Detective Moretti and your passing the polygraph exam conducted by James McGowan, former Montgomery County Detective, this will confirm that I have been advised by law enforcement and the District Actorney's Office of Montgomery County that they have concluded their investigation and no charges will be filed against you.

Please let me know if you have any further questions.

Very truly yours,

McMAHON, LENTZ & THOMPSON

h Mc Maken

John T. McMahon, Jr.

JIMJR:lal

21 West Airy Street
 Norristown, PA 19401
 (610) 272-9502
 Fax (610) 272-1036

☐ 711 West Avenue Second Floor Jenkintown, PA 19046 (800) 859-6262 <u>Tab 35</u>

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY FIRST JUDICIAL DISTRICT OF PENNSYLVANIA TRIAL DIVISION – CIVIL

LEON VS GOODMAN ETAL April Term 2023 No. 00452

CASE MANAGEMENT ORDER STANDARD TRACK

TRIAL DIVISION - CIVIL 13-DEC-2023

A. FARBER

AND NOW, Wednesday, December 13, 2023, it is Ordered that:

- 1. The case management and time standards adopted for standard track cases shall be applicable to this case and are hereby incorporated into this Order.
- 2. All *discovery* on the above matter shall be completed not later than *05-AUG-2024*.
- 3. **Plaintiff** shall identify and submit *curriculum vitae and expert reports* of all expert witnesses intended to testify at trial to all other parties not later than **05-AUG-2024**.
- 4. **Defendant and any additional defendants** shall identify and submit curriculum vitae and expert reports of all expert witnesses intended to testify at trial not later than 02-SEP-2024.
- 5. All *pre-trial motions* shall be filed not later than *02-SEP-2024*.
- 6. A *settlement conference* may be scheduled at any time after *02-SEP-2024*. Prior to the settlement conference all counsel shall serve all opposing counsel and file a settlement memorandum containing the following:
 - (a). A concise summary of the nature of the case if plaintiff or of the defense if defendant or additional defendant;
 - (b). A statement by the plaintiff or all damages accumulated, including an itemization of injuries and all special damages claimed by categories and amount;
 - (c). Defendant shall identify all applicable insurance carriers, together with applicable limits of liability.
- 7. A *pre-trial conference* will be scheduled any time after *04-NOV-2024*. Fifteen days prior to pre-trial conference, all counsel shall serve all opposing counsel and file a pre-trial memorandum containing the following:

- (a). A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant:
- (b). A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
- (c). A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
- (d). Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This list shall include as appropriate, computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed; and
- (e). Defendant shall state its position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability;
- (f). Each counsel shall provide an estimate of the anticipated length of trial.
- 8. *It is expected that the case will be ready for trial 02-DEC-2024*, and counsel should anticipate trial to begin expeditiously thereafter.
- 9. All counsel are under a continuing obligation and are hereby ordered to serve a copy of this order upon all unrepresented parties and upon all counsel entering an appearance subsequent to the entry of this Order.

BY THE COURT:

GWENDOLYN BRIGHT, J. TEAM LEADER

ACF94753(REV 11/04)

<u>Tab 36</u>

By: Neil M. Hilkert, Esq. Lida L. Bonner, Esq. Attorney I.D. Nos. 44696 & 83985 600 W. Germantown Ave. Suite # 400 Plymouth Meeting, PA 19462 (610) 940-1663 TEL neil@paxlegalllc.com lida@paxlegalllc.com



Edwin Leon,	:	IN THE COURT OF COMMON PLEAS
Plaintiff vs.	:	PHILADELPHIA COUNTY
Cheyenne Goodman and	:	CIVIL DIVISION – LAW
Nehama Hanoch	:	Case ID No. 230400452
Defendants	:	

PRAECIPE TO SUBSTITUE/ATTACH

TO THE PROTHONOTARY:

Kindly use the attached first page of the Complaint as a replacement first page for the Filed Complaint removing the previous page, which inadvertently contained a defendant not named in this complaint.

Respectfully submitted,

PAX LEGAL, LLC

BY: NEIL M. HILKERT, ESQUIRE ATTORNEY FOR PLAINTIFF

Edwin Leon

DATED: December 13, 2023

By: Neil M. Hilkert, Esq. Lida L. Bonner, Esq.

Attorney I.D. Nos. 44696 & 83985

600 W. Germantown Ave.

Suite # 400

Plymouth Meeting, PA 19462

(610) 940-1663 TEL neil@paxlegalllc.com lida@paxlegalllc.com

COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PA

Counsel for Plaintiff,

Edwin León

CIVIL ACTION

CASE ID NO. 230400452

EDWIN LEÓN 622 Fulton St.

Conshohocken, PA 19428

Plaintiff,

v.

NEHAMA HANOCH 101 W. 10th St.

Wilmington, DE 19801

and

CHEYENNE GOODMAN

101 W. 10th St.

Wilmington, DE 19801

:

Defendants

COMPLAINT

Plaintiff, Edwin León, ("Plaintiff"), hereby files this Complaint against the Defendants, Nehama Hanoch, (the "Hanoch Defendant") Cheyenne Goodman, (the "Goodman Defendant") and in support thereof, avers as follows:

I. THE PARTIES

Plaintiff, Edwin León ("Plaintiff") is an adult individual with a residence at 622
 Fulton Street, Conshohocken, Pennsylvania 19428.

By: Neil M. Hilkert, Esq. Lida L. Bonner, Esq. Attorney I.D. Nos. 44696 & 83985 600 W. Germantown Ave. Suite # 400 Plymouth Meeting, PA 19462 (610) 940-1663 TEL neil@paxlegalllc.com lida@paxlegalllc.com

Edwin Leon,	IN THE COURT OF COMMON PLEAS	
Plaintiff	PHILADELPHIA COUNTY	
vs. Cheyenne Goodman	CIVIL DIVISION – LAW	
and Nehama Hanoch	Case ID No. 230400452	
Defendants		

CERTIFICATE OF SERVICE

TO THE PROTHONOTARY:

I hereby certify that the Praecipe to Substitute/Attach is being served on all counsel of record by electronic mail on the 13th day of December 2023.

PAX LEGAL, LLC

BY: NEIL M. HILKERT, ESQUIRE ATTORNEY FOR PLAINTIFF

Edwin Leon

DATED: December 13, 2023

By: Neil M. Hilkert, Esq. Lida L. Bonner, Esq. Attorney I.D. Nos. 44696 & 83985 600 W. Germantown Ave. Suite # 400 Plymouth Meeting, PA 19462 (610) 940-1663 TEL neil@paxlegalllc.com lida@paxlegalllc.com



Edwin Leon,	:
	: IN THE COURT OF COMMON PLEAS
Plaintiff	: PHILADELPHIA COUNTY
VS.	:
	CHAIL DHAIGION I ANA
Cheyenne Goodman	: CIVIL DIVISION – LAW
and	
Nehama Hanoch	: Case ID No. 230400452
and	
Roxanne Eastes	
Defendants	

PRAECIPE FOR DISMISSAL OF DEFENDANT ROXANNE EASTES ONLY WITHOUT PREJUDICE

To The Office of Judicial Records:

IT IS HEREBY AGREED by and between the parties hereto, as evidenced by the signatures of the Defendant attorneys set forth herein below, that defendant Roxanne Eastes is dismissed without prejudice as defendant in the within action.

/s/ Cheyenne A. Goodman, Esquire
CHEYENNE A. GOODMAN, ESQUIRE
SELF REPRESENTED

BIELLI & KLAUDER, LLC

/s/ Thomas D. Bielli, Esquire
BY: THOMAS D. BIELLI, ESQUIRE
ATTORNEY FOR DEFENDANT
Roxanne Eastes

/s/ Nehama L. Hanoch, Esquire
NEHAMA L. HANOCH, ESQUIRE
SELF REPRESENTED

PAX LEGAL, LLC

BY: NEIL M. HILKERT, ESQUIRE ATTORNEY FOR PLAINTIFF

Edwin Leon

DATED: December 13, 2023

<u>Tab 37</u>

By: Neil M. Hilkert, Esq. Lida L. Bonner, Esq. Attorney I.D. Nos. 44696 & 83985 600 W. Germantown Ave. Suite # 400 Plymouth Meeting, PA 19462 (610) 940-1663 TEL neil@paxlegalllc.com lida@paxlegalllc.com



Edwin Leon,	:	IN THE COURT OF COMMON PLEAS
Plaintiff vs.	:	PHILADELPHIA COUNTY
Cheyenne Goodman and	:	CIVIL DIVISION – LAW
Nehama Hanoch	:	Case ID No. 230400452
Defendants	:	

CERTIFICATE OF SERVICE

TO THE PROTHONOTARY:

I hereby certify that Plaintiffs First Request for Admission and Plaintiff's First Request for the Production of Documents directed to Defendant, Nehama Hanoch has been served on all parties of record by electronic mail on the 18th day of December 2023.

PAX LEGAL, LLC

BY: NEIL M. HILKERT, ESQUIRE ATTORNEY FOR PLAINTIFF

Edwin Leon

DATED: December 18, 2023

<u>Tab 38</u>

By: Neil M. Hilkert, Esq. Lida L. Bonner, Esq. Attorney I.D. Nos. 44696 & 83985 600 W. Germantown Ave. Suite # 400 Plymouth Meeting, PA 19462 (610) 940-1663 TEL neil@paxlegalllc.com lida@paxlegalllc.com



Edwin Leon,	:	NATIVE COMPT OF COMMON NATIO
Plaintiff vs.	:	IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY
Cheyenne Goodman and	:	CIVIL DIVISION – LAW
Nehama Hanoch	:	Case ID No. 230400452
Defendants	:	

PRAECIPE TO ATTACH VERIFICATION TO COMPLAINT

TO THE PROTHONOTARY:

Kindly use the attached Verification of Plaintiff and attach to the Complaint filed in this matter.

Respectfully submitted,

PAX LEGAL, LLC

BY: NEIL M. HILKERT, ESQUIRE ATTORNEY FOR PLAINTIFF

Edwin Leon

DATED: December 18, 2023

VERIFICATION

I, Edwin Leon, being duly sworn, depose and say that I am the Plaintiff in the foregoing Complaint and verify that the averments contained in the foregoing document are true and correct according to my knowledge, information and belief.

Date: December 18, 2023 /s/ Edwin Leon
EDWIN LEON

<u>Tab 39</u>

BRIAN J. FOLEY, Attorney at Law (PA ID No. 68806)

6701 Germantown Avenue, Suite 200 Philadelphia, PA 19119 (267) 930-4425 v (267) 930-4427 f Attorney for Defendant Nehama Hanoch



EDWIN LEÓN :

COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PA

CIVIL ACTION

Plaintiff,

v. : NO. 230400452

NEHAMA HANOCH :

and

CHEYENNE GOODMAN

Defendants. :

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Please kindly entry my appearance on behalf of Nehama Hanoch, a defendant in this action.

Respectfully submitted,

BRIAN J. FOLEY, ESQ.

Brian J. Foley, Esquire

Dated: December 28, 2023

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served a copy of the foregoing Entry of Appearance upon counsel of record and all parties by electronically filing with this Court on December 28, 2023.

Respectfully submitted,

BRIAN J. FOLEY, ESQ.

Brian J. Foley, Esquire

Dated: December 28, 2023 Attorney for Defendant Nehama Hanoch

<u>Tab 40</u>

IN THE COURT OF COMMON PLEAS PHILADELPHIA TRIAL DIVISION - CIVIL

Filed and Attested by the Office of Judicial Records
29 DEC 2023 01:01 pm
L S. GILLIAM

Edwin Leon,	
Plaintiff	
V.	Civil Action Docket No. 230400452
Cheyenne Goodman, et al.,	
Defendants.	

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Please kindly enter my appearance on behalf of Cheyenne Goodman, a defendant in this action.

Dated: December 29, 2023

Daniel W. Katz

Attorney ID: 317905

Law Offices of Daniel Katz, Esquire LLC

<u>Tab 41</u>

Civil Administration C. ARTWELL

LAW OFFICES OF DANIEL W. KATZ, ESQUIRE, LLC. BY: DANIEL. KATZ, ESQUIRE Identification No. 317905 121 S. Broad Street

13th Floor

Philadelphia, PA 19107

Attorney for Chevenne Goodman

IN THE COURT OF COMMON PLEAS PHILADELPHIA TRIAL DIVISION - CIVIL

Edwin Leon,	
Plaintiff	
v.	Civil Action Docket No. 230400452
Cheyenne Goodman, et al.,	
Defendants.	

<u>DEFENDANTS JOINT EMERGENCY MOTION FOR EXTENSION OF TIME TO</u> ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

Defendants, Cheyenne Goodman ("Ms. Goodman") and Nehama Hanoch ("Ms. Hanoch," together with Ms. Goodman, the "Defendants"), by and through their undersigned counsel, file this joint motion to respectfully request that this Court enter an order pursuant to pursuant to Rule 1003 of the Pennsylvania Rules of Civil Procedure ("PA RCP"), extending the time in which Defendants must answer or otherwise plead in response to the complaint filed by Edwin Leon (the "Plaintiff," and together with Ms. Goodman and Ms. Hanoch, the "Parties"), in the above-captioned proceeding (the "Action"). In support of this motion, Defendants further states as follows:

LEGAL STANDARD

1. Under Rule 1003 this Court, "on cause shown" has discretion to extend the time in

which pleadings must be filed. Ps. R. C. P. 1003; see also Peterson v. Philadelphia Suburban

Transportation Co., 435 Pa. 232, 255 A.2d 577 (1969). Under Rule 1003, a defendant seeking to

invoke the court's discretion to extend time must show two things: (a) a good reason or "cause" for

extending the time in which a responsive pleading must be filed, and (b) that the plaintiff will not

be prejudiced by defendant's failure to file a timely answer. Durante v. Pittsburgh, Chartiers &

Youghiogheny Railway Co., 87 Pa.D. & C. 505, 102 P.L.J. 130 (1953).

2. In determining whether a plaintiff will be prejudiced by such extension, the Court

shall inquire to determine whether the plaintiffs rights will be substantially prejudiced, and whether

that prejudice arises from the lateness of the response and not the fact that the response itself is

prejudicial. Id.

<u>ARGUMENT</u>

1. This Court should grant the instant motion because significant cause exists to

extend the Defendants' time for responding to the complaint, and the Plaintiff will not be

prejudiced—let alone significantly prejudiced—by such extension.

2. Since the filing of the complaint in this Action, Defendants have been diligently

seeking counsel in this matter.

3. On December 28, 2023, undersigned counsel ("Attorney Foley") for Defendant

Nehama Hanoch filed an entry of appearance.

4. On December 28, 2023, Attorney Foley contacted counsel for Plaintiff and Ms.

Goodman requesting a stipulation to extend Defendants time to respond to the complaint, citing

his recent entry of appearance and the fact that Ms. Goodman was in the process of retaining an

attorney.

5. Plaintiff's counsel responded that same day, representing that Plaintiff would only

agree to such stipulation to answer the complaint, and declined to agree to extend for any other

applicable responsive pleading. Further, Plaintiff's counsel refused to extend the response time

for Ms. Goodman, citing that Ms. Goodman had previously been proceeding in this Action pro se.

6. On the morning of December 29, 2023, Ms. Goodman emailed Plaintiff's counsel

confirming that she was indeed in the process of retaining undersigned counsel, and similarly

requesting a stipulation to extend the time to respond to the complaint, and, due to the time-

sensitive nature of the issue, requesting a response by noon that day. Plaintiff's counsel responded

with the same averment, refusing to allow Defendants counsel adequate time to effectively respond

to the complaint.

7. On December 29, 2023, Ms. Goodman retained the undersigned counsel ("Attorney

<u>Katz</u>") to represent her in this Action. Attorney Katz submitted an entry of appearance on that

same day.

8. On this same day, Attorney Foley is traveling out of state to care for his mother in

the wake of her second heart attack in a year. Plaintiff's counsel is aware of Mr. Foley's out of

state travel. Attorney Katz emailed Plaintiff's counsel reiterating the request for a stipulation to

extend the deadline, and was met again with a denial of willingness to extend any deadline, other

than to answer the complaint. All this clearly is occurring right before courts and law offices close

for the New Year's Eve holiday, and counsel for the Plaintiff refuses to show even slight

professional courtesy, in an obvious attempt to further handicap Defendants from mounting an

adequate and competent defense.

9. Absent an extension of the Defendants' time to respond to the complaint, counsel

will only have a mere four (4) days, one of which is a national holiday, to become acquainted with

the extensive history of this case-which necessarily includes the history of a nine-month long

related protection from abuse ("PFA") trial between Ms. Goodman and the Plaintiff-research, and

draft a response to the complaint. To require this of Defendants and their counsel would cause

extreme prejudice against Defendants.

9. Plaintiff's counsel submitted no reason for his refusal to agree to such extension

beyond the fact that Ms. Goodman was previously proceeding pro se. Thus, the only plausible

explanation for Plaintiff's refusal to grant the requested extension is that Plaintiff is attempting to

force Defendants to file their responses to his complaint without the meaningful benefit of counsel.

The Court should reject this inappropriate gamesmanship.

10. As it stands, the projected settlement conference date in this Action is September

2, 2024. The projected pre-trial conference date is November 4, 2024, and the projected trial date

is December 2, 2024. The fourteen (14) day extension of the Defendants' time to respond to the

complaint will not impede this current scheduling. Indeed, the Plaintiff has already begun his

discovery efforts despite not yet having a response to his complaint.¹

11. Accordingly, based on the above, Defendants submits that good cause exists for

this Court to grant an extension to Defendants' time to respond to the complaint, and that the

Plaintiff will suffer no prejudice by such extension.

CONCLUSION

For the foregoing reasons, Defendants respectfully requests that this Court enter an order,

substantially in the form attached hereto, extending the date upon which Defendants must respond

to the complaint to Thursday, January 18, 2024, to allow Defendants newly-entered counsel

adequate time to effectively respond to the complaint.

¹ Plaintiff submitted several extensive pre-complaint discovery requests which the Court ordered him to withdraw.

Shortly thereafter, on December 18, 2023, Plaintiff served discovery requests upon Ms. Hanoch.

Dated: December 29, 2023

Daniel W. Katz
Attorney ID: 317905
Law Offices of Daniel Katz, Esquire LLC
Attorney for Defendant Goodman

_____/s/______Brian Foley
Attorney ID:68806
Attorney for Defendant Hanoch

IN THE COURT OF COMMON PLEAS PHILADELPHIA TRIAL DIVISION - CIVIL

Edwin Leon,	
Plaintiff	
v.	Civil Action Docket No. 230400452
Cheyenne Goodman, et al.,	
Defendants.	
AND NOW, this day of Defendants' Emergency Motion for Extension Plaintiff's Complaint(the "Motion"), and any response of the deadline for Defendant is now extended to Thursday, January	
BY	THE COURT:
JUE	DGE

LAW OFFICES OF DANIEL W. KATZ, ESQUIRE, LLC. BY: DANIEL. KATZ, ESQUIRE Identification No. 317905 121 S. Broad Street 13th Floor Philadelphia, PA 19107 Attorney for Cheyenne Goodman

IN THE COURT OF COMMON PLEAS PHILADELPHIA TRIAL DIVISION - CIVIL

Edwin Leon,	
Plaintiff	
V.	Civil Action Docket No. 230400452
Cheyenne Goodman, et al.,	
Defendants.	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served a copy of the foregoing document upon counsel of record and all parties by electronically filing with this Court on December 29, 2023.

Dated: December 29, 2023

Daniel W. Katz Attorney ID: 317905

Law Offices of Daniel Katz, Esquire LLC

Attorney for Defendant Cheyenne Goodman

PHILADELPHIA COURT OF COMMON PLEAS PETITION/MOTION COVER SHEET

FOR COURT USE ONLY			
ASSIGNED TO JUDGE:	ANSWER/RESPONSE DATE:		
	01/22/2024		
Do not send Judge courtesy copy of Petition/Motion/Answer/Response. Status may be obtained online at http://courts.phila.gov			

NTROL	

24010058

(RESPONDING PARTIES MUST INCLUDE THIS

ASSIGNED TO JUDGE:	ANSWER/RESPONS	SE DATE:	NUMBER ON	ALL FILINGS)		
	01/22/2024		75		0000	
Do not send Judge courtesy copy of Petition/Motion/Answer/Response. Status may be obtained online at http://courts.phila.gov		onse.	Month	00450	Term, $\frac{2023}{Year}$	
Status may be obtained online at his	р.жойнз.рий.дог		No	00452	2	
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			NEHAMA HANC	OCH-DET		
NDICATE NATURE OF DOC ☐ Petition (Attach Rule to Show ☐ Answer to Petition ☐		Is another pet	etition/motion been decition/motion pending? of either question is yes, yes		Yes X N	
		JOSHUA R	OBERTS	I		
TYPE OF PETITION/MOTION (see list	·			PETITION/MOTION (see list on reverse s		
MOT-EXT OF TIME TO	ANSWER/RESP			MTEXT		
ANSWER / RESPONSE FILED TO (PI	ease insert the title of the corres	sponding petition/mo	ion to which you are respond	ling):		
I. CASE PROGRAM	- E		RTIES (required for proof			
DAY FORWARD/MAJOR	JURY PROGRAM	unrepre	address and telephone sented parties. Attach a of record and unrepresente	stamped addressed of		
Name of Judicial Team Leader:	JUDGE GWENDOLYN		K A KEIGHTLY			
BRIGHT Applicable Petition/Motion Dead	line: N / A	Commence of the Commence of th	NESHAMINY INTER EVOSE PA 19053	RPLEX SUITE	200 ,	
Has deadline been previously ext			M HILKERT			
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			TENNE GOODMAN	0 004		
			00 N. KING STRE			
			EL W KATZ	001		
			W OFFICES OF DA	ANIEL W KATZ	E 121 S	
			OAD ST 13TH FLO	OOR , PHILAD	ELPHIA PA	
			107			
			MA L HANOCH 01 PENNSYLVANIA	A AVE NW STE	. 120 .	
			SHINGTON DC 200		. 120 /	
III. OTHER						
By filing this document and signing between upon all counsel and unreprese erifies that the answers made herein a	ented parties as required by rul	es of Court (see PA	R.C.P. 206.6, Note to 208.	2(a), and 440). Furthe	ermore, moving par	
	De.	cember 29,	2023 DANIEL	W KAT7		
(Attorney Signature/Unreprese		(Date)	(Print Name		(Attorney I.D. No	
Amorney Signaturer Our eprese	mea i arry)	(Dute)	(1 rim ivame	,	(Anorney L.D.)	

The Petition, Motion and Answer or Response, if any, will be forwarded to the Court after the Answer/Response Date. No extension of the Answer/Response Date will be granted even if the parties so stipulate.

<u>Tab 42</u>

IN THE COURT OF COMMON PLEAS PHILADELPHIA TRIAL DIVISION - CIVIL

Edwin l	∠eon,
---------	-------

Plaintiff

٧.

Civil Action Docket No. 230400452

Cheyenne Goodman, et al.,

Defendants.

230400452-Leon Vs Goodman Etal



AND NOW, this 2 wday of _______, 2023, upon consideration of

Defendants' Emergency Motion for Extension of time to Answer or Otherwise Respond to Plaintiff's Complaint(the "Motion"), and any response thereto, the Motion is GRANTED and it is hereby ORDERED that the deadline for Defendants to answer or otherwise respond to the complaint is now extended to Thursday, January 18, 2024.

BY THE COURT:

JUDGE